

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

IN THE MATTER OF NorthWestern Energy's
2012-2013 Electricity Supply Tracker

IN THE MATTER OF NorthWestern Energy's
2013-2014 Electricity Supply Tracker

REGULATORY DIVISION

Docket Nos. D2013.5.33, D2014.5.46

**DATA REQUESTS MEIC-012 THROUGH MEIC-032
OF MONTANA ENVIRONMENTAL INFORMATION CENTER AND SIERRA CLUB
TO NORTHWESTERN ENERGY**

Montana Environmental Information Center and Sierra Club, by and through their legal counsel, hereby submit their data requests 012 through 032 to NorthWestern Energy. Within fourteen (14) days, please forward responses to the data requests below to the undersigned counsel.

GENERAL INSTRUCTIONS

- 1) **Definitions:** For the purposes of these data requests, the following definitions shall apply:
 - a) The term "NorthWestern Energy" means NorthWestern Energy, its parent company or companies, and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
 - b) The term "Company" means and includes NorthWestern Energy, its parent company or companies and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
 - c) "Document" means all written, recorded or graphic matters, however produced or reproduced, pertaining in any manner to the subject of this proceeding, whether or not now in existence, without limiting the generality of the foregoing, all originals, copies and drafts of all writings, correspondence, telegrams, notes or sound recordings of any type of personal or telephone communication, or of meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, results of

investigations, reviews, contracts, agreements, working papers, statistical records, ledgers, books of account, vouchers, bank checks, x-ray prints, photographs, films, videotapes, invoices, receipts, computer printouts or other products of computers, computer files, stenographer's notebooks, desk calendars, appointment books, diaries, or other papers or objects similar to any of the foregoing, however denominated. If a document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reasons of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each non-identical copy is a separate "document."

- d) "And" or "or" shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.
- e) The term "you" and "your" refer to "NorthWestern Energy."
- f) The term "person" means any natural person, corporation, corporate division, partnership, limited liability company, other unincorporated association, trust, government agency, or entity.
- g) The term "regarding" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- h) The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
- i) "Identify" or "identifying" or "identification" when used in reference to a person that is a natural person means to state: the full name of the person and any names under which he conducts business; the current employer of the person, the person's job title and classification, the present or last known work address of the person; and, the present or last known telephone number of the person.
- j) "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:
 - (a) the type of document (e.g., letter, memorandum, etc.);
 - (b) the date of the document;
 - (c) the title or label of the document;
 - (d) the Bates stamp number or other identifier used to number the document for use in litigation;

- (e) the identity of the originator;
 - (f) the identity of each person to whom it was sent;
 - (g) the identity of each person to whom a copy or copies were sent;
 - (h) a summary of the contents of the document;
 - (i) the name and last known address of each person who presently has possession, custody or control of the document; and,
 - (j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.
- k) “Identify” or “identifying” or “identification” when used in reference to communications means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, identify the document(s) containing or referring to the communication.
 - l) “Current” when used in reference to time means in the present time of this data request.
 - m) “Customer” means a person who buys retail electricity on a regular and ongoing basis.
 - n) “Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas in-tact.

2) OTHER INSTRUCTIONS

- a) Please provide responses with fourteen (14) days of the date of these requests.
- b) Responses are to be provided in electronic format (e.g., text documents should be in the original word processor file format or PDF, data files should be in Excel).
- c) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
 - (a) The privilege asserted and its basis;
 - (b) The nature of the information withheld; and,

- (c) The subject matter of the document, except to the extent that you claim it is privileged.
- d) For any document or set of documents NorthWestern Energy objects to providing on the grounds it is burdensome or voluminous, please identify the specific document.
- e) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
- f) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
- g) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
- h) For each response, identify all persons (see instruction 1(j)) that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.
- i) Identify which witness(es) at the hearing(s) is competent to adopt and/or discuss the response.
- j) Please produce the requested documents in electronic format to the following individuals:

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- k) Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to MEIC and Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).
- l) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.
- m) MEIC and Sierra Club reserve the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

Discovery Requests 012-032

MEIC-012 Subject: Resolving the Colstrip 4 Outage

Please provide a detailed list of the events that actually represented the critical path of returning Colstrip Unit 4 to service following the July 1, 2013 trip and the date(s) for which each such event actually represented the outage critical path.

MEIC-013 Subject: Schedule for Fixing the Colstrip 4 Outage

Provide each schedule prepared by or for the Company on or after July 1, 2013 and through January 23, 2014 which projected the date when Colstrip Unit 4 was forecast to return to service and the key repairs or equipment replacements that would be required before the Unit could return to service.

MEIC-014 Subject: Repair Plan for Colstrip 4 Outage

Please refer to the direct testimony of Kevin J. Markovich, page 9, lines 10-12 referring to a "repair plan." Please produce:

- a. the repair plan;
- b. communications dated July 19, 2013 from the owners of Colstrip Unit 4 indicating that they concurred in the repair plan;
- c. all communications, including e-mails, sent between July 1, 2013 and July 19, 2013, from NorthWestern to any owner of Colstrip Unit 4 regarding the causes of the July 1 event that led Colstrip Unit 4 to trip off-line.
- d. all communications, including e-mails, sent between July 1, 2013 and July 19, 2013, to NorthWestern from any owner of Colstrip Unit 4 regarding the causes of the July 1 event that led Colstrip Unit 4 to trip off-line.

- e. all communications, including e-mails, sent between July 1, 2013 and July 19, 2013, from NorthWestern to any owner of Colstrip Unit 4 regarding the “repair plan” for Colstrip Unit 4.
- f. all communications, including e-mails, sent between July 1, 2013 and July 19, 2013, to NorthWestern from any owner of Colstrip Unit 4 regarding the “repair plan” for Colstrip Unit 4.

MEIC-015 Subject: Repair Plan for Colstrip 4 Outage

Please refer to the direct testimony of Kevin J. Markovich, page 9, lines 10-12 referring to a “repair plan.” To the extent not produced in response to MEIC-015, please produce:

- a. all communications, including e-mails, sent between July 1, 2013 and the end of the outage on January 23, 2014 from NorthWestern to any owner of Colstrip Unit 4 regarding the causes of the July 1 event that led Colstrip Unit 4 to trip off-line.
- b. all communications, including e-mails, sent between July 1, 2013 and the end of the outage on January 23, 2014 to NorthWestern from any owner of Colstrip Unit 4 regarding the causes of the July 1 event that led Colstrip Unit 4 to trip off-line.
- c. all communications, including e-mails, sent between July 1, 2013 and the end of the outage on January 23, 2014 from NorthWestern to any owner of Colstrip Unit 4 regarding the “repair plan” for Colstrip Unit 4.
- d. all communications, including e-mails, sent between July 1, 2013 and the end of the outage on January 23, 2014 to NorthWestern from any owner of Colstrip Unit 4 regarding the “repair plan” for Colstrip Unit 4.

MEIC-016 Subject: Colstrip 4 Outage Meetings

Please indicate whether the Company had meetings during the period July 1, 2013 to January 23, 2014 to discuss the work that was being done and that needed to be done to return Colstrip Unit 4 to service. If the answer is yes, please provide the notes or minutes of each such meeting and all attachments thereto.

MEIC-017 Subject: Shift Reports During Colstrip 4 Outage

Provide copies of any Colstrip Unit 4 shift reports for any part of the period beginning on 12:01 am on July 1, 2013 through the Unit’s return to service on January 23, 2014.

MEIC-018 Subject: Market Purchases During Colstrip 4 Outage

Please refer to the direct testimony of Kevin J. Markovich, page 9, line 23 through page 10, line 2. Please provide a detailed description of the market transactions that NorthWestern referenced in the statement that “[d]uring the almost seven-month outage, NorthWestern used market purchases and its Basin Creek generating resource to replace the lost production.”

MEIC-019 Subject: Market Purchases During Colstrip 4 Outage

Please refer to the direct testimony of Kevin J. Markovich, page 10, lines 14-15. Please identify each of the hours between July 1, 2013 and January 23, 2014 when the “entire 111MW shortfall had to be replaced.” Please produce all supporting documents or analyses.

- a. For each hour, please specify the cost of the replacement power.

MEIC-020 Subject: Benefit of Colstrip 4 Outage

Please refer to the direct testimony of Kevin J. Markovich, page 10, lines 15-17. Please identify each of the hours between July 1, 2013 and January 23, 2014 during which “customers benefitted from not having the Colstrip generation as NorthWestern did not have to sell excess supply off system.” Please produce all supporting documents and/or analyses.

- a. Please provide NorthWestern’s annual off-system sales for each of the last 5 years in terms of MWh sales and dollars of revenue.
- b. Please provide NorthWestern’s annual off-system sales attributable solely to off-system sales from Colstrip Unit 4 for each of the last 5 years in terms of MWh sales volume and dollars of revenue.

MEIC-021 Subject: Generation During Colstrip 4 Outage

Did NorthWestern increase generation at any unit(s) it owns, wholly or partially, to make up for the Colstrip Unit 4 generation lost from July 1, 2013 through January 23, 2014?

- a. If yes, please specify the unit, and the amount, by day, by which generation increased due to the Colstrip 4 outage.

MEIC-022 Subject: Insurance Claim for Colstrip 4 Outage

Has NorthWestern submitted a property insurance claim regarding any damaged property and/or equipment that led to the July 1, 2013 event that tripped Colstrip Unit 4 off-line?

- a. If yes, please produce all communications between NorthWestern and its insurer regarding this claim.

MEIC-023 Subject: Incremental Cost of Colstrip 4 Outage

Please refer to the dissenting opinion on June 18, 2014 in Docket No. D.2013.5.33 and D.2014.5.46 of Commissioner Travis Kavulla, page 3, stating that \$11,135,466 represents the “Commission staff’s best guess, given the information available at present, of the incremental costs of the outage, beyond the ordinary fixed and variable costs of CU4 that could have been expected were the plant operational.” Please state whether NorthWestern agrees with the statement quoted above.

MEIC-024 Subject: Costs at Colstrip

For each month during the last five years, please provide the following data for Colstrip Units 1, 2, and 3:

- a. Variable costs;
- b. Fixed costs;
- c. Fuel costs;
- d. Capacity factor; and
- e. MWh output.

MEIC-025 Subject: Costs at Colstrip 4

For the last five years, please provide the following data for Colstrip Unit 4:

- a. Variable costs;
- b. Fixed costs;
- c. Fuel costs;
- d. Capacity factor; and
- e. MWh output.

MEIC-026 Subject: Outages at Colstrip

Please provide the following data for each planned or unplanned outage of a unit at Colstrip that occurred after the date on which NorthWestern acquired Colstrip:

- a. The unit(s) at which the outage occurred;
- b. Whether the outage was planned or unplanned;
- c. The duration, in days, of the outage; and
- d. The cost of the outage.

MEIC-027 Subject: Outages at NorthWestern Plants

Please provide the following data for each planned or unplanned outage of a coal-fired unit wholly or partially owned by NorthWestern, if such outage occurred after the date on which NorthWestern acquired Colstrip:

- a. The unit(s) at which the outage occurred;
- b. Whether the outage was planned or unplanned;
- c. The duration, in days, of the outage; and
- d. The cost of the outage.

MEIC-028 Subject: Forced Outage Rate at NorthWestern Plants

For each coal-fired unit that NorthWestern wholly or partially owns, please provide the forced outage rate from 2004-2014.

MEIC-029 Subject: Engineering Assessments of Colstrip 4

Has NorthWestern prepared, or caused to be prepared or have in its possession, any engineering material condition assessment or evaluation of Colstrip Unit 4 prepared since January 1, 2010? If so, please provide the most recent such study.

MEIC-030 Subject: Engineering Assessments of Colstrip 4

Has NorthWestern prepared, or caused to be prepared or have in its possession, any engineering assessment of the long-term prospects of operating Colstrip Unit 4 reliably? If so, please produced the most recent such engineering study.

MEIC-031 Subject: Useful Life of Colstrip 4

For planning purposes, what does NorthWestern assume is the useful life of Colstrip Unit 4?

- a. When does NorthWestern assume that Colstrip Unit 4 will be fully depreciated?

MEIC-032 Subject: Economic Analyses of Colstrip 4

Has NorthWestern prepared, or caused to be prepared or have in its possession, any studies, analyses or assessments prepared since January 1, 2010 of the economics of continuing to operate Colstrip Unit 4 versus replacing the Unit or converting it to burn natural gas? If so, please produce the most recent such study.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of October, 2014, I served the foregoing "Data Requests MEIC-012 through MEIC-032" by first-class mail, postage prepaid, to the following:

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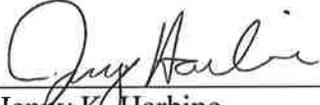
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