



November 14, 2014

Ms. Kate Whitney
Utility Division
Montana Public Service Commission
1701 Prospect Avenue
PO Box 2022601
Helena, Montana 59620-2601

**Re: Docket Nos. D2013.5.33/D2014.5.46 Electric Tracker
MCC Set 1 (001-112) Data Requests**

Dear Ms. Whitney:

Enclosed for filing is a copy of the remainder of NorthWestern Energy's responses to MCC Set 1 (001-112) Data Requests – those not provided with our initial filing on November 7, 2014. Responses included herewith are as follows: MCC-015, MCC-016, MCC-017, MCC-018, MCC-020, MCC-038, MCC-039, MCC-040, MCC-047, MCC-050, MCC-077, MCC-079, MCC-081, MCC-085, and MCC-108.

These responses are due today per Procedural Order No. 7283b, Paragraph 8, which states that parties have 21 days to respond to “data requests that request voluminous production of documents.”

These responses will be hand delivered to the Montana Public Service Commission and the Montana Consumer Counsel this date. They will be mailed to the service list in this docket, e-filed on the PSC website, and emailed to counsel of record.

Should you have questions please contact Joe Schwartzberger at (406) 497-3362.

Sincerely,

Tracy Lowney Killoy
Administrative Assistant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the following NorthWestern Energy responses to MCC Set 1 (001-112) Data Requests in Docket Nos. D2013.5.33/D2014.5.46 has been hand delivered to the Montana Public Service Commission and to the Montana Consumer Counsel this date:

MCC-015, MCC-016, MCC-017, MCC-018, MCC-020, MCC-038, MCC-039,
MCC-040, MCC-047, MCC-050, MCC-077, MCC-079, MCC-081, MCC-085,
and MCC-108.

These responses will be e-filed on the PSC website, emailed to counsel of record, and served on the most recent service list by mailing a copy thereof by first class mail, postage prepaid.

Date: November 14, 2014


Tracy Lowney Killoy
Administrative Assistant
Regulatory Affairs

Docket No. D2013.5.33/ D2014.5.46
Service List

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NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

MCC-015 Regarding: Colstrip Unit 4 Outage
 Witness: N/A

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

RESPONSE (November 14, 2014):

See the emails responsive to this data request in the "MCC-015" folder on the attached CD. See also the responses to Data Requests MCC-017, MEIC-2, and MEIC-6. Please note that several emails have not been produced at this time due to Siemens' notification to NorthWestern that it plans to file a motion for protective order in this docket in order to protect information that it believes is confidential, trade secret information. NorthWestern will update this response when the Commission has acted on Siemens' motion for protective order. In addition, one email and its attachments are not being produced because they contain information that NorthWestern considers to be confidential, trade secret information. NorthWestern will file a motion for protective order regarding this information next week and will update this response when the Commission has acted on NorthWestern's motion.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

MCC-016 Regarding: Colstrip Unit 4 Outage
 Witness: N/A

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.

RESPONSE (November 14, 2014):

Please see the response to Data Request MCC-015. See also the response to Data Request MEIC-9 for a copy of the Root Cause Analysis, which will be provided once the Commission acts on a forthcoming Motion for Protective Order from Siemens.

NorthWestern Energy
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Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

MCC-017 Regarding: Colstrip Unit 4 Outage
 Witness: Mike Barnes

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.

RESPONSE (November 14, 2014):

See the "MCC-017" folder on the CD attached to MCC-015. NorthWestern's share of the deductible relating to this event was 15% of \$2.5 million or \$375,000. Please note that an email has not been produced at this time due to Siemens' notification to NorthWestern that it plans to file a motion for protective order in this docket in order to protect information that it believes is confidential, trade secret information. NorthWestern will update this response when the Commission has acted on Siemens' motion for protective order.

NorthWestern Energy
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Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

MCC-018 Regarding: Colstrip Unit 4 Outage
 Witness: N/A

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.

RESPONSE (November 14, 2014):

See the "MCC-018" folder on the CD attached to MCC-015. Several emails that were responsive to this data request have been identified as privileged. Attached is a privilege log documenting those emails that have not been produced based on this claim. Please note that several emails responsive to this data request have not been produced at this time due to Siemens' notification to NorthWestern that it plans to file a motion for protective order in this docket in order to protect information that it believes is confidential, trade secret information. NorthWestern will update this response when the Commission has acted on Siemens' motion for protective order. Please also note that information that is not responsive has been redacted in several emails and attachments.

MCC-018
 Privilege Log – Attorney/Client and Work Product

Document ID	Author	Recipients	Subject	Privilege	Date
3(113)	Al Brogan	Pat Corcoran, John Hines, Kevin Markovich, Mike Barnes	Email response to request for feedback on draft answers to questions from the MPSC regarding the Colstrip 4 outage	Attorney/Client	1/3/2014
3(116)	Pat Corcoran	Tim Olson Cc: John Hines, Kevin Markovich, Mike Barnes, Al Brogan	Email seeking additional feedback on draft answers to questions from the MPSC regarding the Colstrip 4 outage	Attorney/Client	1/3/2014
2088085	Kevin Markovich	Sarah Norcott Cc: Pat Corcoran, John Hines, Colleen Harper, Joe Schwarzenberger	Email with attachment seeking advice regarding the approach to calculating replacement power volumes needed due to CU4 outage	Attorney/Client	8/21/2013
2088044	Sarah Norcott	Kevin Markovich Cc: Pat Corcoran, John Hines, Colleen Harper, Joe Schwarzenberger	Email response to request for advice regarding the approach to calculating replacement power volumes needed due to CU4 outage	Attorney/Client	8/21/2013
3(139)	Kevin Markovich	Frank Bennett Cc: Mike Barnes	Email chain regarding inclusion of testimony about the Colstrip 4 outage in upcoming electric tracker filing	Work Product	5/7/2014

Document ID	Author	Recipients	Subject	Privilege	Date
2088075	Al Brogan	Pat Corcoran, John Hines, Kevin Markovich, Heather Grahame	Email seeking advice regarding calculation of the cost of the 2013 CU4 outage	Work Product	8/13/2014

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
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Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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

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.

RESPONSE (November 14, 2014):

Kevin Markovich response: See the response to Data Request MEIC-5 for cost estimates of replacement power.

Mike Barnes response: See the responses to Data Requests MCC-015, MCC-017, and MEIC-6. Please note that several emails that discuss the cost to repair CU4 have not been produced at this time due to Siemens' notification to NorthWestern that it plans to file a motion for protective order in this docket in order to protect information that it believes is confidential, trade secret information. NorthWestern will update this response when the Commission has acted on Siemens' motion for protective order.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

See the monthly PDF files in the "MCC-038" folder on the CD attached to Data Request MCC-015. Note that the values have been changed in Exhibit__(FVB-1)12-13 Updated provided in response to Data Request PSC-001b in Docket No. D2013.5.33.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

See the response to Data Request MCC-038.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

See the response to Data Request MCC-038.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

See the response to Data Request MCC-038.

The previous tracker forecast is based on a balanced portfolio that does not have the variability we experience in weather, loads, variable generation output, and similar hourly changes that are reflected in the actual tracker values.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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

Please provide a detailed breakdown and description (and supporting documentation) for each of the monthly entries for DGGS 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.

RESPONSE (November 14, 2014):

Please see the monthly PDFs in the "MCC-050" folder on the CD attached to MCC-015. The DGGS fuel cost consists of the total of natural gas, diesel, transportation, and storage charges used for the plant operations. The DGGS energy supply cost is the average daily Mid-C rate less \$7 for the first 7 MW of output of the plant each hour. The DGGS revenue credits are a reduction to costs from the energy sales of the plant.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

Please see the monthly PDF files in the "MCC-077" folder on the CD attached to MCC-015. Note that the values have changed in Exhibit__(FVB-1)13-14 Updated provided in response to Data Request MCC-076.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

Please see the response to Data Request MCC-077.

North Western Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

Please see the response to Data Request MCC-077.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

Please see the response to Data Request MCC-077.

NorthWestern Energy
Docket D2013.5.33/D2014.5.46
Electric Tracker

Montana Consumer Counsel (MCC)
Set 1 (001-112)

Data Requests received October 24, 2014

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.

RESPONSE (November 14, 2014):

Please see the monthly PDFs in the "MCC-108" folder on the CD attached to MCC-015.