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

IN THE MATTER OF NorthWestern Energy's)	
2013 and 2014 Applications for (1) Approval of)	REGULATORY DIVISION
Deferred Cost Account Balances for Electricity)	
Supply, CU4 Variable Costs/Credits, DGGS)	DOCKET NO. D2013.5.33
Variable Costs/Credits, Spion Variable)	
Costs; and (2) Projected Electricity Supply Cost)	DOCKET NO. D2014.5.46
Rates, CU4 Variable Rates, DGGS Variable)	
Rates, and Spion Variable Rates)	

**NORTHWESTERN ENERGY'S ADDITIONAL RESPONSE TO THE
MONTANA CONSUMER COUNSEL'S MOTION TO COMPEL**

NorthWestern Corporation doing business as NorthWestern Energy ("NorthWestern") submits this *Additional Response to the Montana Consumer Counsel's Motion to Compel Responses to Data Requests or Alternatively to Disallow Certain Costs and Brief in Support* ("Additional Response"). On November 26, 2014, NorthWestern filed a *Response to the Montana Consumer Counsel's Motion to Compel* ("Response"). In the Response, given the

holiday week, NorthWestern's counsel indicated that she was unable to confirm certain arguments put forth by the Montana Consumer Counsel ("MCC") regarding data requests to which it believed NorthWestern had not fully responded. Specifically, NorthWestern could not completely respond to the MCC's contentions regarding MCC-027 and MCC-052. NorthWestern provides this Additional Response addressing those two data requests.

a. MCC-027 – Updated Response

MCC-027 sought documentation, memos or correspondence in NorthWestern's possession or control regarding insurance purchased by PPLM that would have covered the event in question at CU4. In response to MCC-027, NorthWestern provided a copy of the operating agreement between the owners of CU4 and PPLM. MCC asserts that the operating agreement provides that a copy of all insurance policies will be provided to each owner. MCC Response, p. 11. NorthWestern agrees that the operating agreement signed in 1981 contains such a provision; however, this does not mean that NorthWestern still has a copy of such insurance policies in its possession. NorthWestern's counsel has contacted the individual who manages CU4 on behalf of NorthWestern and has learned that NorthWestern does not have in its possession, custody or control a copy of the insurance policy that PPLM purchased on behalf of the owners of CU4.

b. MCC-052 – Updated Response

MCC-052(a) asked NorthWestern to produce in electronic format with all links intact the economic dispatch for Basin Creek. NorthWestern responded by directing the MCC to the exhibits attached to Mr. Bennett's testimony. The MCC argues that (1) NorthWestern did not provide the information in electronic form; and (2) the exhibits in Mr. Bennett's testimony do not contain all necessary information for economic dispatch. MCC Response, p. 12. First, NorthWestern has provided copies of Mr. Bennett's exhibits in electronic format. *See* response to

PSC-001(a) and MCC-076.¹ Next, Basin Creek is used mainly as a peaking plant by NorthWestern's Energy Supply and it is dispatched when economic conditions warrant. For further information on economic dispatch, please see the updated response to MCC-052(a) filed on December 3, 2014.

Notwithstanding the foregoing, after review, NorthWestern has determined that the reference to Mr. Bennett's exhibits did not provide a full response. The data request asked for the most recent 36 months available. The most recent month available of Basin Creek's economic dispatch is October 2014. Additionally, Mr. Bennett's exhibits in this docket provided data starting in July 2012. In order to complete NorthWestern's response to this data request, it will file an updated response to MCC-052, which will show the economic dispatch for Basin Creek from November 2011 to October 2014.

Respectfully submitted this 3rd day of December, 2014.

NORTHWESTERN ENERGY

By: 
Sarah Norcott
Al Brogan

Attorneys for NorthWestern Energy

¹ It should be noted that the information sought in this data request in electronic format does not contain formulas or links.

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's Additional Response to the Montana Consumer Counsel's Motion to Compel 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. It 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: December 3, 2014

A handwritten signature in blue ink that reads "Tracy Lowney Killoy". The signature is written in a cursive style and is positioned above a horizontal line.

Tracy Lowney Killoy
Administrative Assistant
Regulatory Affairs

Docket No. D2013.5.33/D2014.6.46
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