

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

**PPL MONTANA, LLC's MOTION TO INTERVENE
FOR THE LIMITED PURPOSE OF APPLYING FOR PROTECTIVE ORDER**

PPL Montana, LLC ("PPLM") hereby moves to intervene in the above-captioned proceeding for the limited purpose of applying for a Protective.

I. NAME AND ADDRESS OF MOVANT

The movant is:

PPL Montana, LLC
303 North Broadway
Billings, Montana 59101

II. NAME AND ADDRESS OF ATTORNEY

Movant's attorney is:

William W. Mercer
Holland & Hart LLP
401 North 31st Street
Suite 1500
P.O. Box 639
Billings, Montana 59103-0639
Telephone: (406) 252-2166
wwmerc@hollandhart.com

III. STATEMENT OF MOVANT'S INTEREST IN PROCEEDING:

Movant's interest in this proceeding is limited to applying for and securing a Protective Order for the purpose of protecting trade secret information which is within the scope of Data Requests Nos. MEIC 26 and MEIC 28 made by the Montana Environmental Information Center ("MEIC") to Northwestern Energy ("NWE").

Movant is simultaneously filing its Motion For Protective Order, with supporting Affidavit of Charles S. Baker, Controller for PPLM, setting forth the grounds for seeking the Protective Order.

Neither MEIC nor NWE oppose PPLM's motion.

IV. GOOD CAUSE

The Commission, in an order dated June 2, 2014, established an intervention deadline of July 18, 2014 for this case. ARM § 38.2.2403 provides that motions for intervention filed after the deadline may be granted for good cause shown. In this case, the Movant, PPLM, did not become aware of the fact its trade secrets could be disclosed in this matter until after MEIC filed its Data Requests and the Commission ruled on November 26, 2014 on motions brought by NWE with respect to these data requests. Upon learning of the potential for disclosure of its trade secrets in responses by NWE to the MEIC's Data Requests, Movant acted expeditiously to confirm the possibility of disclosure, to identify the Information which could comprise trade secrets, to evaluate the Montana constitutional presumption in favor of disclosure of documents in proceedings before the Commission, and to prepare its motions and supporting documentation for filing. If the Commission does not exercise its discretion to grant this late -- filed Motion for Intervention, Movant will lose the opportunity to protect its trade secrets and will suffer economic harm.

V. RELIEF DESIRED

Movant respectfully requests that the Public Service Commission grant this Motion For Intervention to allow Movant to seek and secure a Protective Order as described in the Motion For Protective Order and supporting documents filed at the same time as this Motion. Service of Documents:

Movant requests that all documents in this proceeding be served on:

William W. Mercer
Holland & Hart LLP
401 North 31st Street
Suite 1500
P.O. Box 639
Billings, Montana 59103-0639
Telephone: (406) 252-2166
wwmerc@hollandhart.com

DATED this 6th day of January, 2015.


for William W. Mercer
Holland & Hart LLP
401 North 31st Street
Suite 1500
P.O. Box 639
Billings, Montana 59103-0639

ATTORNEYS FOR PPL MONTANA, LLC

CERTIFICATE OF SERVICE

This is to certify that the foregoing was mailed to the following persons by first class U.S. Mail on the date herein.

Kate Whitney
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 Overnight Mail
 Hand Delivery
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 E-Mail

Dated this 6th day of January, 2015.

