



February 18, 2015

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  
Updated response to MEIC-35 MEIC Set 3  
(032-043) Data Requests**

Dear Ms. Whitney:

Enclosed for filing is a copy of NorthWestern Energy's updated response to MEIC-35 in MEIC Set 3 (032-043) data requests. This response will be hand delivered to the Montana Public Service Commission and the Montana Consumer Counsel. This response will be mailed to the service list in this docket, e-filed with the PSC, and emailed to counsel of record.

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

Sincerely,

Tracy Lowney Killoy  
Administrative Assistant

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of NorthWestern Energy's updated response to MEIC-35 in MEIC Set 3 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. It will be e-filed on the PSC website, e-mailed to counsel of record, and served on the most recent service list by mailing a copy thereof by first class mail, postage prepaid.

Date: February 18, 2015

A handwritten signature in cursive script that reads "Tracy Lowney Killoy". The signature is written in black ink and is positioned above the printed name and title.

Tracy Lowney Killoy  
Administrative Assistant  
Regulatory Affairs

Docket No. D2013.5.33/D2014.6.46  
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**NorthWestern Energy**  
**Docket D2013.5.33/D2014.5.46**  
**Electric Tracker**

**Montana Environmental Information Center/Sierra Club**  
**Set 3 (032-043)**

Data Requests received November 12, 2014

MEIC-35                      Subject: Colstrip 4 Outage Meetings  
                                    Witness: N/A

Provide copies of the minutes and notes of the Colstrip Owners Meetings held since June 1, 2013 and all attachments thereto.

RESPONSE:

NorthWestern objects to MEIC-35 because it is overly broad and therefore seeks irrelevant information. For the applicable legal standard for this objection, please see the response to Data Request MEIC-32 (*Revised*). This data request seeks information that is overly broad and therefore seeks information that is not relevant or reasonably calculated to lead to discovery of admissible evidence because the request seeks copies of minutes and notes from Colstrip Owners' Meetings from June 1, 2013 to present and is not limited to minutes or notes that only discuss the CU4 outage. The issues in an electricity supply tracker docket involve requests to recover electricity supply costs that have been incurred during a tracker period. With respect to the replacement power costs incurred during the tracker period involved in this docket, the Commission must determine if the costs were prudent. In order to determine if the replacement power costs were prudent, the Commission must look to see what NorthWestern knew or should have known at the time the costs were incurred. During Colstrip Owners' Meetings, other matters are discussed which are unrelated to the outage that occurred in 2013. Thus, some of the information sought in this data request unequivocally has nothing to do with, nor does it have any legitimate bearing on, the outage at CU4 or the other issues in this docket. As such, it will not lead to admissible evidence regarding the outage or what NorthWestern knew or should have known with respect to the outage, and therefore it is not relevant.

Without waiving said objection, NorthWestern provides as Attachments 1 and 2, the copies of minutes and notes, respectively, from Colstrip Owners Meetings from June 1, 2013 to present that contain any discussion regarding the outage at CU4. See also the response to Data Request MEIC-6.

Please note that objected-to information has been redacted. Headings have been left unredacted to show that the body of the discussion is irrelevant to the issues in this docket. Additionally, information that Siemens plans to protect and information regarding coal costs that are the subject of NorthWestern's motion for protective order filed on November 21, 2014 have been redacted in yellow. NorthWestern will provide an updated response to this data request to reflect the Commission's orders on the motions for protective order.

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

**Montana Environmental Information Center/Sierra Club**  
**Set 3 (032-043)**

Data Requests received November 12, 2014

MEIC-35 cont'd

UPDATED RESPONSE (February 18, 2015):

Pursuant to Commission Order Nos. 7283c and 7283d, protected versions of the pages containing yellow redactions in Attachment 1 and all four pages of Attachment 2 will be provided on yellow paper to the Commission and the parties who sign the appropriate non-disclosure agreements. Please note that irrelevant information remains redacted in black.