



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
Second Updated Response to MCC-015
Updated Response to MCC-017 and MCC-018
MCC Set 1 (001-112) Data Requests**

Dear Ms. Whitney:

Enclosed for filing is a copy of NorthWestern Energy's updated responses to MCC-015, MCC-017 and MCC-018 in MCC Set 1 (001-112) data requests. These responses will be hand delivered to the Montana Public Service Commission and the Montana Consumer Counsel. These responses 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 Schwartzenberger at (406) 497-3362.

Sincerely,

Tracy Lowney Killoy
Administrative Assistant

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's second update response to MCC-015 and updated responses to MCC-017 and MCC-018 in MCC Set 1 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. These 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


Tracy Lowney Killoy
Administrative Assistant
Regulatory Affairs

Docket No. D2013.5.33/D2014.6.46
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.

UPDATED RESPONSE (February 4, 2015):

See Attachments 1 and 2, the public versions of an email and its attachment regarding the Coal Supply Agreement for Colstrip Unit 4. Pursuant to Commission Order No. 7283d, protected versions of these attachment pages containing redactions have been provided on yellow paper to the Commission and the parties who signed the appropriate non-disclosure agreement.

Additionally, with respect to the email, portions of the email are considered protectable based on the attorney/client privilege and not waived due to the common interest doctrine. As a result, these redactions (in black) remain even on the protected version. And although the information necessary for a privilege log is unredacted in the email, a privilege log is being separately provided as Attachment 3 with this updated response.

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 cont'd

SECOND UPDATED RESPONSE (February 18, 2015):

See Attachment 4, the public version of emails responsive to this data request in the "MCC-015" folder on the attached CD. Pursuant to Commission Order No. 7283c, the protected version of Attachment 4 will be provided in the "MCC-015 folder" on a yellow CD to the Commission and the parties who sign the appropriate non-disclosure agreement.

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-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.

UPDATED RESPONSE (February 18, 2015):

See Attachment 1, the above-referenced email, and Attachment 2, the public version of that email's attachment, in the "MCC-017" folder on the CD attached to the second updated response to MCC-015. Pursuant to Commission Order No. 7283c, a protected version of Attachment 2 is being provided in the "MCC-017" folder on the yellow CD attached to the second updated response to MCC-015 to the Commission and the parties who sign the appropriate non-disclosure agreement.

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-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.

UPDATED RESPONSE (February 18, 2015):

See the public version of emails responsive to this data request in the "MCC-018" folder on the CD attached to the second updated response to MCC-015. Pursuant to Commission Order No. 7283c, protected versions of these emails are being provided in the "MCC-018" folder on the yellow CD attached to the second updated response to MCC-015 to the Commission and the parties who sign the appropriate non-disclosure agreement.