

Service Date: September 17, 2015

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

IN THE MATTER OF NorthWestern Energy's
2013-2014 Electricity Supply Tracker

Docket Nos. D2013.5.33, D2014.5.46

**PRE-HEARING MEMORANDUM OF
MONTANA ENVIRONMENTAL INFORMATION CENTER AND SIERRA CLUB**

In accordance with the revised procedural Order issued by the Commission on February 27, 2015, Montana Environmental Information Center and Sierra Club (collectively, "MEIC") submit this prehearing memorandum.

I. CONTESTED ISSUES

- 1) Whether NorthWestern prudently incurred replacement power costs during the extended Unit 4 outage, in light of NorthWestern Energy's failure to mitigate and/or disclose risks associated with a potential outage.
- 2) Whether replacement power costs associated with the Colstrip Unit 4 extended outage should be borne by ratepayers, in light of NorthWestern Energy's failure to evaluate potential liability for such costs by third parties.

II. UNCONTESTED ISSUES

MEIC represents that all issues that are unrelated to the Colstrip Unit 4 outage and the replacement power costs incurred as a result of the outage are not contested by MEIC in this proceeding.

III. WITNESSES

MEIC will call as a witness Mr. David Schlissel, who presented testimony on behalf of MEIC in this cause.

IV. EXHIBITS AND DATA RESPONSES

MEIC will offer the pre-filed testimony, and all exhibits attached thereto, of Mr. David Schlissel. In addition, MEIC believes that all responses to data requests, and attachments to responses to data requests in this cause should be introduced into evidence. MEIC specifically intends to introduce the responses to the following data requests along with all attachments thereto:

MEIC- 005, 9, 11, 25, 26, 28, 39, 40, 43-51, 53, 60-66, 69-84, 88, 90

MCC- 015, 17, 18, 24, 56, 118, 141, 142

PSC- 009, 9, 51, 55, 59-60, 64

V. WITNESS SCHEDULING

MEIC, NorthWestern, and MCC have agreed that MEIC's witness, Mr. David Schlissel, will be called on October 8, 2015.

Respectfully submitted on this 17th day of September, 2015,



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*On behalf of Petitioners Montana Environmental
Information Center and Sierra Club*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2015, I served the foregoing "Pre-Hearing Memorandum of Montana Environmental Information Center and Sierra Club" by first-class mail, postage prepaid, to the following:

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