

PUBLIC SERVICE COMMISSION  
STATE OF MONTANA

Brad Johnson, Chairman  
Travis Kavulla, Vice Chairman  
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May 29, 2015

Mr. Robert Nelson  
Montana Consumer Counsel  
111 N. Last Chance Gulch Suite 1B  
P.O. Box 201703  
Helena, MT 59620-1703

RE: Data requests in Consolidated Dockets D2013.5.33 and D2014.5.46

Dear Mr. Nelson,

Enclosed please find data requests of the Montana Public Service Commission to Montana Consumer Counsel numbered PSC-035 through PSC-040 in the referenced Docket. Please begin the response to each new numbered data request on a new page. Please provide responses by June 12, 2015. If you have any questions, please contact me at (406) 444-6191.

Sincerely,



Neil Templeton  
Regulatory Division  
Montana Public Service Commission

Service Date: May 29, 2015

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

IN THE MATTER OF NorthWestern ) REGULATORY DIVISION  
Energy's 2012-2013 Electricity Supply )  
Tracker ) DOCKET NO. D2013.5.33  
)  
IN THE MATTER OF NorthWestern ) DOCKET NO. D2014.5.46  
Energy's 2013-2014 Electricity Supply )  
Tracker )

**DATA REQUESTS PSC-035 THROUGH PSC-040 OF THE**  
**MONTANA PUBLIC SERVICE COMMISSION**  
**TO**  
**MONTANA CONSUMER COUNSEL**

PSC-035

Regarding: 2014-2015 Tracking Period  
Witness: Donkin

Has NorthWestern requested final approval of any costs associated with hedging deals entered into after November 18, 2014 in this proceeding?

PSC-036

Regarding: Outage Cost Estimate  
Witness: Wilson

You testify, "NWE has calculated several 'estimates of what the actual power replacement costs might have been,'" and note "an earlier estimate . . . that was made by the Commission staff," but you do not provide your own estimate of the replacement power costs attributable to the outage.

- a. Have you analyzed or estimated the costs attributable to the outage that NorthWestern is seeking to recover in this proceeding? Please provide your estimate(s).
- b. Should the Commission be concerned that the only party to this proceeding that has provided estimates of these costs is the party seeking cost recovery?

- c. Do you take any position with respect to the accuracy or methodology underlying any of the figures that you set forth on page 14 of your testimony? Please explain.

PSC-037

Regarding: Replacement Power Costs  
Witness: Wilson

On page 17 of your testimony, you refer to the “incremental cost of replacement power,” and also suggest denial of “cost recovery for replacement power costs.”

Is it your position that the Commission should disallow all replacement costs associated with the outage, or merely the incremental replacement costs associated with the outage? Please explain what you mean by incremental.

PSC-038

Regarding: Electricity Supply Costs  
Witness: Wilson

For the 2013-2014 tracking period, NorthWestern seeks final approval to collect a total of \$411,720,021 through electricity supply rates:

\$273,282,745 for supply costs +  
\$72,745,544 + \$19,007,429 for CU4 costs +  
\$28,234,531 + \$12,210,687 for DGGs costs +  
\$6,217,360 + \$21,725 for Spion Kop costs

*See Response to MCC-076 (Nov. 7, 2014).*

- a. Is it your position that some of the electricity supply costs that NorthWestern claims in this proceeding were not actually incurred? If so, please identify the amount that was not actually incurred.
- b. Is it your position that some of the electricity supply costs that NorthWestern claims for the 2013-2014 tracking period were not prudently incurred? If so, please identify the amount that was not prudently incurred.
- c. Given your testimony regarding CU4 replacement power costs and lost revenues, of the \$411,720,021 associated with the 2013-2014 tracking period, what amount should ultimately be recovered by the utility through the electricity supply rates?

## PSC-039

Regarding: Lost Revenue Repetition at 23:10-13

Witness: Wilson

- a. When did you first become aware that “NWE’s LRAM methodology assumes that each prior year’s conservation fully repeats itself in each subsequent year and that the Company is entitled to full lost revenue compensation for the assumed repetition of that estimated conservation in each year?”
- b. Has this aspect of NWE’s LRAM methodology changed since the Commission first approved NorthWestern’s recovery of lost revenues in 2005?
- c. Can you provide specific examples of repeated savings and associated lost revenues that are unwarranted? If so, please explain.

## PSC-040

Regarding: Lost Revenue Disallowance

Witness: Wilson

At 33:18-20 you recommend that if any interim revenue adjustments are retained, they should be limited to traditional fuel and purchased power costs.

- a. Are you recommending that the Commission disallow all or part of the requested lost revenues in these consolidated dockets?
- b. If so, please specify the amount of disallowance you are recommending, accompanied by electronic worksheets to support the recommendation.