

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

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IN THE MATTER Of NorthWestern Energy's) REGULATORY DIVISION
Application for: (1) Unreflected Gas Cost Account)
Balance and Projected Gas Cost; and (2) Gas) DOCKET NO. D2013.5.34
Transportation Adjustment Clause Balance)

IN THE MATTER Of NorthWestern Energy's) REGULATORY DIVISION
Application for: (1) Unreflected Gas Cost Account)
Balance and Projected Gas Cost; and (2) Gas) DOCKET NO. D2014.5.47

**DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL
TO NORTHWESTERN ENERGY**

MCC-066

Regarding: NorthWestern Energy (NorthWestern) Exhibits
Witness: J. Schwartzberger

Please provide on compact disk electronic working copies, with all links intact, of all exhibits (including related workpapers, where applicable), that are being sponsored by Mr. Schwartzberger in support of his rebuttal testimony in this case.

MCC-067

Regarding: Total Resource Cost
Witness: J. Schwartzberger

At JS-10, lines 21-23, Mr. Schwartzberger states "NorthWestern has consistently included a 10% environmental benefit factor in its Total Resource Cost test to evaluate natural gas DSM cost effectiveness."

- a. Please describe in detail each type of environmental benefit that NorthWestern believes is realized from its natural gas USB activities.
- b. Please describe in detail how NorthWestern calculated, estimated, or arrived at that 10% environmental benefit factor.
- c. Has NorthWestern been ordered or directed by the Commission to include a 10% environmental benefit factor in performing Total Resource Cost

tests? If so, please identify the docket number and order number in which NorthWestern was so ordered or directed.

- d. Please provide copies of all “Total Resource Cost” tests performed by NorthWestern for its natural gas USB activities during program periods 2012-2013 and 2013-2014.

MCC-068

Regarding: Cost Effectiveness
Witness: J. Schwartzberger

Please refer to JS-23, lines 1-8.

- a. Please provide copies of the Total Resource Cost tests used by NorthWestern to screen the measures included in its USB programs during the 2012-2013 and 2013-2014 gas tracker periods.
- b. Please provide copies of all documents prepared by NorthWestern and/or SBW that support SBW’s determination that the natural gas portion of the Energy Audit program was cost effective on average during the evaluation period.
- c. Please define the “evaluation period” referred to there at line 6.

MCC-069

Regarding: Cost Effectiveness
Witness: J. Schwartzberger

At JS-16, lines 12-17, Mr. Schwartzberger states “From 2004 through 2012, the portion of qualified weatherization costs funded by NorthWestern was decreasing significantly as a result of the termination of funds available through the American Recovery and Reinvestment Act.”

- a. Please identify the other entity or other entities that also provided funding, in addition to NorthWestern, of qualified weatherization activities from 2004 through 2012.
- b. Please provide the total dollar amounts provided by other entities to fund NorthWestern’s qualified weatherization activities from 2004 through 2012.
- c. Please identify any other entity or other entities that also provided funding, in addition to NorthWestern, of qualified weatherization activities, during each of program periods 2012-2013 and 2013-2014.

- d. Please provide the total dollar amounts provided by other entities to fund NorthWestern's qualified weatherization activities, during each of program periods 2012-2013 and 2013-2014.

MCC-070

Regarding: Battle Creek Fixed-Cost Unit Rate
Witness: P.J. DiFronzo

At PJD-3, lines 1-5, Mr. DiFronzo discusses the development of the fixed-cost unit rate of \$0.1237/Dkt approved by the Commission for Battle Creek.

- a. Please state the first month and year in which NorthWestern's total gas cost tracker rate reflected that \$0.1237/Dkt rate.
- b. Please confirm that the \$0.1237/Dkt fixed-cost unit rate for Battle Creek approved by the Commission is based on the annual revenue requirement shown in the "Rev Req" tab in the excel file labeled "PSC-040a Attachment" that has been provided by NorthWestern in this case in response to PSC-040(a). If you do not confirm please provide a description of the reason(s) why you do not so confirm.
- c. Please confirm that the annual revenue requirement shown in the "Rev Req" tab in the excel file labeled "PSC-040a Attachment" that has been provided by NorthWestern in this case in response to PSC-040(a) is based on the test year January 2011 – December 2011. If you do not confirm please provide a description of the reason(s) why you do not so confirm, and identify the actual test year that was used by NorthWestern to develop the \$0.1237/Dkt fixed-cost unit rate that has been approved by the Commission.
- d. Please provide updated calculations of the Battle Creek annual revenue requirement and the related fixed-cost unit rate, using test year data from January 2014 – December 2014.