

**PUBLIC SERVICE COMMISSION
STATE OF MONTANA**

Brad Johnson, Chairman
Travis Kavulla, Vice Chairman
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Roger Koopman, Commissioner
Bob Lake, Commissioner



1701 Prospect Avenue
PO Box 202601
Helena, MT 59620-2601
Voice: 406.444.6199
Fax #: 406.444.7618
<http://psc.mt.gov>
E-Mail: psc_webmaster@mt.gov

June 26, 2015

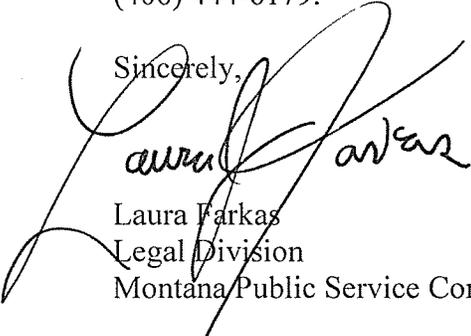
Mr. Joe Schwartzberger
Northwestern Energy
40 East Broadway
Butte, MT 59701

RE: Data requests in Docket D2015.3.32

Dear Mr. Schwartzberger,

Enclosed please find data requests of the Montana Public Service Commission (Commission) to NorthWestern Energy (NWE) numbered PSC-001 through PSC-024 in the above referenced Docket. Please begin the response to each new numbered data request on a new page. Please provide responses on or before July 13, 2015. If you have any questions, please contact me at (406) 444-6179.

Sincerely,


Laura Farkas
Legal Division
Montana Public Service Commission

Service Date: June 26, 2015

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

| | | |
|---|---|------------------------|
| IN THE MATTER OF Havre Pipeline |) | REGULATORY DIVISION |
| Company's Service Quality and Its |) | |
| Response to Notice of Commission Action |) | DOCKET NO. D2015.3.32 |
| in N2014.11.92 |) | |
| |) | |
| IN THE MATTER OF the Request of the |) | DOCKET NO. N2014.11.92 |
| Montana Public Service Commission for |) | |
| Havre Pipeline Company Service Quality |) | |
| Information |) | |

DATA REQUESTS PSC-001 THROUGH PSC-024 OF THE
MONTANA PUBLIC SERVICE COMMISSION
TO
NORTHWESTERN ENERGY

PSC-001

Regarding: Tariff
Witness:

Please explain how HPC decides whether a customer should be served under a PSC regulated tariff or otherwise.

PSC-002

Regarding: Tariff
Witness:

Please provide copies of all tariffs under which HPC provides service.

PSC-003

Regarding: Reasonably Adequate Service
Witness:

- a. Does reasonably adequate service include a promptness, frequency, or time-of-day element?

- b. How quickly does HPC respond to a call for service?
- c. What limitations does HPC place on service responses based on time of day?
- d. Does HPC place any limitations on frequency of service responses (i.e., are Farm Tap customers limited to a certain number of responses in a given period)?

PSC-004

Regarding: Subsequent Owners Knowledge

Witness:

Were complaining owners who were not the original Farm Tap agreement negotiators apprised of or made aware of the special circumstances and contractual obligations governing the Farm Tap agreement?

PSC-005

Regarding: Status of Regulation

Witness:

Please detail each instance in the last decade of which you are aware when HPC has informed customers of the regulatory status of the service.

PSC-006

Regarding: Special Terms and Conditions

Witness:

- a. What is the significance of the inclusion of additional special terms and conditions in a rate tariff approved by the MPSC?
- b. Does the issuance of a tariff supersede individual agreements contracted for by the customer or HPC under Montana law?

PSC-007

Regarding: Customer Classes

Witness:

- a. For each tariff, please provide a list of customers who receive service under that tariff.
- b. Please provide a list of customers who receive service from HPC, but not under a PSC tariff.
- c. For each tariff, please provide the invoices for the month of January 2013, 2014 and 2015 from five randomly sampled customers from the list or lists in (a).

- d. Please provide the invoices for the month of January 2013, 2014 and 2015 from five randomly sampled customers from the list in (b).

PSC-008

Regarding: Customer Service

Witness:

Please explain specifically:

- a. The hours during which HPC responds to customer complaints.
- b. The number of hours of personnel time devoted to resolving customer complaints.
- c. The average time that it takes HPC to respond to a customer complaint.
- d. How are service calls prioritized?

PSC-009

Regarding: Customer Service

Witness:

What specific steps has HPC taken to assist customers on the gas gathering system experiencing loss of gas service?

PSC-010

Regarding: Customer Service

Witness:

What specific service obligations does HPC have to its Farm Tap customers?

PSC-011

Regarding: Customer Service

Witness:

Has NWE in any way changed the manner in which it serves the customers of HPC after it acquired majority ownership of the company?

PSC-012

Regarding: Customer Service

Witness:

- a. What has HPC done to address freezing in the gas gathering lines?
- b. Has HPC investigated the possibility of installing dehydrators or other gas treatment equipment upstream of Farm Tap customers on the gas gathering pipeline to reduce the amount of water in the gas and subsequent freezing in the gas line?

- c. If costs of installation and operations of gas treatment equipment were accounted for in tariffed rates, what would be the cost to customers?

PSC-013

Regarding: Revenue

Witness:

- a. Are the revenues of customers receiving regulated and unregulated service accounted for differently in the annual report?
- b. Please cite to the place in the annual reports where this representation of accounting occurs.
- c. Please identify, where the revenue from regulated and non-regulated service is accounted for in HPC's annual reports for the last 5 years.

PSC-014

Regarding: Revenue

Witness:

- a. Are the revenues of customers receiving regulated and unregulated service accounted for differently on the books of HPC?
- b. Please provide copies of the books where those revenues are accounted for.

PSC-015

Regarding: Declining Service Accommodations

Witness:

Is HPC or NWE aware of any accommodations other regulated gas companies, such as Montana Power Company, made to customers when service quality suffered as a result of declining pressures on gas systems? Please explain those accommodations.

PSC-016

Regarding: Abandonment of Service

Witness:

Has the contractual clause granting HPC the right "to abandon such operations . . . [with] no liability [arising] because of any such abandonment . . . of its pipelines or other facilities" ever been invoked?

PSC-017

Regarding: Abandonment of Service

Witness:

Does HPC have procedures or plans to carry out an abandonment of Farm Tap services?
If so, explain.

PSC-018

Regarding: Customer Service

Witness:

- a. How many customers have stopped receiving service from HPC in the last 5 heating seasons?
- b. What circumstances initiated the cessation of service?
- c. What entity initiated the cessation of service?

PSC-019

Regarding: Customer Service

Witness:

- a. How many quality-of-service related calls from all customers has HPC received in each of the last 5 heating seasons?
- b. How many from Farm Tap customers?
- c. Regarding the Farm Tap customers, how many of these calls were regarding issues on the customer responsible portion of the pipe?

PSC-020

Regarding: Customer Service

Witness:

- a. Please identify the employees whose job it is to respond in the field to service-quality complaints.
- b. Please identify the employees whose job it is to answer phone calls or other communications from customers who make service-quality complaints.

PSC-021

Regarding: Customer Service

Witness: Employees identified in PSC-020a

The Montana Public Service Commission is considering what, if anything, HPC should be required to do in response to consumer complaints that the service they receive from HPC has diminished in recent years. The complaints usually cite to engineering problems such as low pressure and gas quality on the lines, but also allege that responses from HPC have not been timely or well-staffed.

- a. In relation to this matter, please describe how your job has changed, if at all, since NorthWestern Energy assumed majority ownership of HPC.
- b. Please provide any other response you believe the Commission would find useful in this matter.

PSC-022

Regarding: Customer Service

Witness: Employees identified in PSC-020b

The Montana Public Service Commission is considering what, if anything, HPC should be required to do in response to consumer complaints that the service they receive from HPC has diminished in recent years. The complaints usually cite to engineering problems such as low pressure and gas quality on the lines, but also allege that responses from HPC have not been timely or well-staffed.

- a. In relation to this matter, please describe how your job has changed, if at all, since NorthWestern Energy assumed majority ownership of HPC.
- b. Please provide any other response you believe the Commission would find useful in this matter.

PSC-023

Regarding: Safety

Witness:

- a. Please detail any safety concerns for Farm Tap customers experiencing low tap pressures.
- b. How has HPC addressed these concerns?

PSC-024

Regarding: Safety

Witness:

How many of the Farm Tap customers on the gas gathering system have a secondary fuel source for heat?