

PUBLIC SERVICE COMMISSION  
STATE OF MONTANA

Brad Johnson, Chairman  
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Kirk Bushman, Commissioner  
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Bob Lake, Commissioner



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September 18, 2015

Mr. Joe Schwartzberger  
Regulatory Affairs Department  
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 to NorthWestern Energy (NWE) numbered PSC-025 through PSC-030 in the referenced Docket. Please begin the response to each new numbered data request on a new page. Please provide responses by September 25, 2015. If you have any questions, please contact me at (406) 444-6179.

Sincerely,

A handwritten signature in black ink that reads "Laura J. Farkas".

Laura J. Farkas  
Legal Division  
Montana Public Service Commission

Service Date: September 18, 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 in	)	DOCKET NO. D2015.3.32
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-025 THROUGH PSC-030 OF THE**  
**MONTANA PUBLIC SERVICE COMMISSION**  
**TO**  
**NORTHWESTERN ENERGY**

PSC-025

Regarding: Petition for Declaratory Ruling and copy of the supplemental filing  
Witness: Alke

- a. Please provide a copy of the Petition for Declaratory Ruling and a copy of the Supplemental Filing in Support of Petition for Declaratory Ruling filed by HPC, which led to the issuance of the Declaratory Ruling (JLA-3).
- b. Did HPC file a motion for reconsideration or a petition for judicial review of the Declaratory Ruling? If so, provide a copy of those filings as well as any resulting Commission or Court order.

PSC-026

Regarding: Application for tariff revisions  
Witness: Alke

- a. Please provide a copy of the application HPC first made for tariff revisions after it acquired the assets discussed in the Declaratory Ruling (JLA-3).

- b. Please provide a copy of the Commission order in that matter, and the resulting approved tariffs.
- c. Please provide a copy of the tariff that HPC inherited from Northern when it acquired the transmission and gathering system.

## PSC-027

Regarding: Pure electric and gas utility  
Witness: Alke

Please see Slide 5 of the PowerPoint presentation accessible at NorthWestern's website at the following URL: <http://northwesternenergy.com/docs/default-source/documents/investor/PresentationEasternandMidwestUpdate04292015.pdf>

- a. Please confirm that NorthWestern professes to be a "Pure Electric & Gas Utility" and a "100% Regulated electric & natural gas utility business."
- b. Has NorthWestern ever qualified this language in written materials presented to investors and others, drawing attention to the allegation you make that the "Commission does not have regulatory jurisdiction" (18:13-14) over part of NorthWestern's interests in HPC, specifically its gathering system?

## PSC-028

Regarding: Costs of HPC's gathering system  
Witness: Alke

- a. Are the costs of HPC's gathering system included in the regulated rates of NorthWestern or HPC customers?
- b. Is HPC's gathering system devoted to the public service of NorthWestern or HPC customers?

## PSC-029

Regarding: Farm tap customers  
Witness: Alke

On page 5 of your rebuttal testimony you state "farm tap customers did not obtain the natural gas they use under a profession of public utility service by a gas distribution utility..." On page 9 of your rebuttal testimony you mention that the Commission's decision in the Declaratory Ruling (JLA-3) stated that "the gathering facilities of HPC were unregulated facilities."

Please reconcile your above statements with the PSC's declaration on page 8 of the Declaratory Ruling (JLA-3) that the "PSC would continue to exercise jurisdiction over the farm tap service pursuant to the tariffs filed at the PSC..."

PSC-030

Regarding: Calculation of gas and non-gas component costs

Witness: DiFronzo

Please explain how your calculation of the gas component and non-gas component costs were made in JLA-4.