



October 2, 2015

Ms. Kate Whitney
Administrator
Montana Public Service Commission
1701 Prospect Ave.
P. O. Box 202601
Helena MT 59620-2601

RE: Docket D2015.8.64 – Greycliff Petition
NorthWestern Energy (NorthWestern) Data Requests to Greycliff Wind Prime, LLC
(NWE-001 through NWE-013)

Dear Ms. Whitney:

Enclosed for filing is one copy of NorthWestern Energy's first set of data requests to Greycliff Wind Prime, LLC (NWE-001-NWE-013).

These data requests will be hand delivered this day to the PSC and MCC, e-filed with the PSC, emailed to counsel of record and mailed to the service list.

If you have any questions, please call Joe Schwartzenberger at (406) 497-3362.

Sincerely,

Pam LeProwse
Administrative Assistant
Regulatory Affairs

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's first set of data requests to Greycliff Wind Prime, LLC (NWE-001 to NWE-013) in Docket No. D2015.8.64 has been hand delivered to the Montana Public Service Commission and to the Montana Consumer Counsel this date. It has also been e-filed on the PSC website, emailed to counsel of record and mailed via first class to the service list as follows:

Kate Whitney, Administrator
MT Public Service Commission
Box 202601
Helena, MT 59620-2601

Monica Tranel
Montana Consumer Counsel
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Wayzata, MN 55391

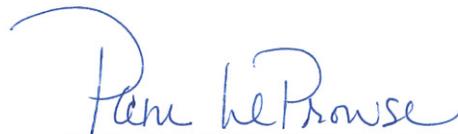
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Pam LeProwse
NorthWestern Energy
40 E. Broadway
Butte, MT 59701

Date: October 2, 2015



Pam LeProwse
Administrative Assistant
Regulatory Affairs

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

IN THE MATTER OF the Petition of) REGULATORY DIVISION
Greycliff Wind Prime, LLC to Set Contract)
Terms and Conditions for a Qualifying) DOCKET NO. D2015.8.64
Small Power Production Facility)

**NORTHWESTERN ENERGY'S FIRST SET OF
DATA REQUESTS TO GREYCLIFF WIND PRIME, LLC**

NWE-001 Regarding: Calculation of Rate
Witness: Robert Stanton Walker

- a. Please provide a detailed breakdown of how Greycliff calculated the proposed avoided cost rate of \$53.85 per megawatt-hour discussed in the testimony of Mr. Stanton Walker.
- b. Please produce any spreadsheets, work papers, other analyses or documentation that discusses or details the calculation of the proposed avoided cost rate.

NWE-002 Regarding: Communication re: avoided cost rate
Witness: Robert Stanton Walker

Please produce all correspondence, whether internal or external including but not limited to email communications, concerning the proposed avoided cost rate proposed by Greycliff in its petition.

NWE-003 Regarding: Negotiations with NorthWestern
Witness: Robert Stanton Walker

- a. Besides the letters attached as Exhibits 1 and 2 to the Greycliff petition, did Greycliff have any other conversations with NorthWestern regarding the possibility of signing a QF contract?
- b. If yes, please identify who at NorthWestern Greycliff spoke with concerning a QF contract.
- c. Please produce all correspondence, whether internal or external including but not limited to email communications, concerning Greycliff's negotiations with NorthWestern concerning a contract for the sale of power to NorthWestern as a qualifying facility.

NWE-004 Regarding: Experience
 Witness: Robert Stanton Walker

- a. Do you have any experience in developing and/or modeling avoided cost rates?
- b. If so, please provide details concerning those experiences, including but not limiting to your role in the modeling, the type of project, and modeling software, if any, used.

NWE-005 Regarding: Request for avoided cost rate
 Witness: Robert Stanton Walker

Did Greycliff ever request from NorthWestern what NorthWestern's current avoided costs were?

NWE-006 Regarding: Nameplate capacity
 Witness: Robert Stanton Walker

What is the nameplate capacity of the Greycliff project?

NWE-007 Regarding: Size and number of each proposed turbine
 Witness: Robert Stanton Walker

How many and what size turbines does Greycliff plan to use for this project?

NWE-008 Regarding: Wind Integration
 Witness: Robert Stanton Walker

Please provide all documents that show NorthWestern agreed to provide and pay for wind integration for the Greycliff project when it was attempting to be certified as a Community Renewable Energy Project.

NWE-009 Regarding: Wind Integration rate
 Witness: Robert Stanton Walker

- a. Please explain how the \$3.50 per megawatt rate described on page 4 of your testimony was calculated.
- b. Please produce all supporting workpapers showing the calculation of this rate.

NWE-010 Regarding: Electricity Market Price Forecast
 Witness: Robert Stanton Walker

- a. Please admit that a market forecast from 2013 would reflect higher market prices on an annualized basis than a market forecast from 2014.
- b. Please admit that a market forecast from 2014 would reflect higher market prices on an annualized basis than a market forecast from 2015.

NWE-011 Regarding: Greenfield price forecast
 Witness: Robert Stanton Walker

Please admit that the price forecast used in the Greenfield docket is from the spring of 2014.

NWE-012 Regarding: Proposed Contract
 Witness: Robert Stanton Walker

- a. Who drafted the proposed contract submitted to NorthWestern in July 2015 and attached to the Greycliff petition as Exhibit 3?
- b. If not drafted by Greycliff or someone working for Greycliff, please indicate where Greycliff obtained a copy of the proposed contract and who, if anyone, modified the proposed contract before it was submitted to NorthWestern.
- c. If the contract was modified by Greycliff, please provide a list of each and every term modified by Greycliff.
- d. Prior to sending the July 2, 2015 letter from Greycliff's counsel, attached as Exhibit 1 to the petition, did Greycliff ever discuss these modifications with NorthWestern to determine if acceptable?
- e. If NorthWestern had agreed to sign the contract that accompanied the July 2, 2015 letter, would Greycliff have been in compliance with all the terms and conditions of that contract?

NWE-013 Regarding: Production Estimates
 Witness: Robert Stanton Walker

Please provide hourly production estimates for a minimum of one calendar year for the Greycliff project.