

PUBLIC SERVICE COMMISSION  
STATE OF MONTANA

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October 2, 2015

Mr. Michael J. Uda  
Uda Law Firm, P.C.  
7 West Sixth Avenue  
Power Block West, 4H  
Helena, MT 59601

RE: Data requests in Docket No. D2015.8.64

Dear Mr. Uda,

Enclosed please find data requests of the Montana Public Service Commission to Greycliff Wind Prime numbered PSC-001 through PSC-011 in the referenced Docket. Please begin the response to each new numbered data request on a new page. Please provide responses by October 16, 2015. If you have any questions, please contact me at (406) 444-6191.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Templeton", written over a horizontal line.

Neil Templeton  
Regulatory Division  
Montana Public Service Commission

Service Date: October 2, 2015

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 Terms ) DOCKET NO. D2015.8.64  
and Conditions for Qualifying Small Power )  
Production Facility Pursuant to M.C.A. )  
§ 69-3-603 )

**DATA REQUESTS PSC-001 THROUGH PSC-011 OF THE**  
**MONTANA PUBLIC SERVICE COMMISSION**  
**TO**  
**GREYCLIFF WIND PRIME**

PSC-001

Regarding: Greycliff Avoided Costs  
Witness: Walker

On page 4 you explain that Greycliff's proposed contract rate is \$50.35, excluding regulation costs.

- a. Do you agree that, excluding wind integration, Greycliff's 25-year levelized CREP RFP bids were \$42.77 in 2012, and \$49.02 in 2014? Why or why not?
- b. Do you agree that Greycliff's CREP bids, if viable, establish ceiling estimates for NWE's avoided costs for Greycliff at those times? Why or why not?
- c. Do you agree that Greycliff's PPA price of \$50.35, if viable, establishes a ceiling estimate for NWE's July 2, 2015 avoided cost for Greycliff? Why or why not?
- d. Please explain why Greycliff's price increased from \$42.77 to \$49.02 to \$50.35.
- e. If the Commission determines that \$50.35 is not appropriate, at what rate below \$50.35 would the Greycliff project cease to be viable?

## PSC-002

Regarding: Current Avoided Cost Information  
Witness: Walker

Please provide any current NorthWestern Energy avoided cost calculations for Greycliff's 25 MW project requested by or provided to Greycliff after the Commission's decision in Docket D2015.2.18 (May 27, 2015) and before Greycliff's July 2, 2015 tendered PPA.

## PSC-003

Regarding: Project Output  
Witness: Walker

Please provide the expected monthly heavy load hour and light load hour production from the 25 MW Greycliff project.

## PSC-004

Regarding: Commercial Operation Date  
Witness: Walker

Please provide the expected commercial operation date assuming the Commission's order in this proceeding sets contract rates and conditions that permit the project to proceed.

## PSC-005

Regarding: Levelization  
Witness: Walker

Why did Greycliff adopt a levelized price in its tendered PPA, rather than an escalating price?

## PSC-006

Regarding: Competitive Pricing  
Witness: Walker

The lowest cost short-listed offer NorthWestern received for a 25 MW wind project in its June 2014 CREP RFP was \$50.88 per MWh, inclusive of wind integration costs estimated to be \$3.69 per MWh. Would it be reasonable to use that \$50.88 per MWh competitive bid based cost as a measure of NorthWestern's avoided costs in this proceeding? Why or why not?

## PSC-007

Regarding: Avoided Cost Calculation Methods  
Witness: Walker

- a. Generally describe the methods for determining avoided cost of which you are aware.
- b. Explain whether you prefer any particular method for determining avoided cost and why you prefer that method.
- c. Do you support the method NorthWestern used to determine the 25-year levelized avoided cost for Greycliff of \$45.01? Why or why not?
- d. Explain whether and to what extent you evaluated the method NorthWestern Energy used to determine the 25-year levelized avoided cost for Greycliff of \$45.01, which NorthWestern initially proposed in Docket D2014.4.43.

## PSC-008

Regarding: Avoided Cost Calculation  
Witness: Walker

- a. Why is it reasonable to calculate avoided costs for Greycliff in this docket using the market price forecast from NorthWestern's 2013 Electricity Supply Resource Procurement Plan?
- b. Provide any current (within the last four months) Mid-Columbia market electricity price forecasts in the possession of Greycliff Wind LLC, Greycliff Wind Prime, or National Renewable Solutions LLC.

## PSC-009

Regarding: PPAs  
Witness: Walker

Please provide any and all Purchase Power Agreements executed between Greycliff and NorthWestern Energy.

## PSC-010

Regarding: Communications between Greycliff and NorthWestern  
Witness: Walker

Please provide any and all communications between Greycliff and NorthWestern Energy since Greycliff became certified as a Qualifying Facility.

PSC-011

Regarding: Greenfield Production  
Witness: Walker

On page 5 you mention the avoided cost rate that Greenfield and NorthWestern stipulated to in D2014.4.43 as a reason why Greycliff's proposed contract rate is reasonable.

- a. Did Greycliff treat Greenfield production as an avoidable resource when Greycliff tendered its July 2, 2015 offer to NorthWestern?
- b. Did Greycliff adjust its July 2, 2015 offer in recognition of Greenfield production, avoidable or unavoidable?
- c. Does Greycliff consider Greenfield production avoidable today? Why or why not?
- d. In the event that Greenfield production is currently unavoidable by NorthWestern, would NorthWestern's avoided cost for Greycliff change? Please describe.