

PUBLIC SERVICE COMMISSION
STATE OF MONTANA

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



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November 25, 2015

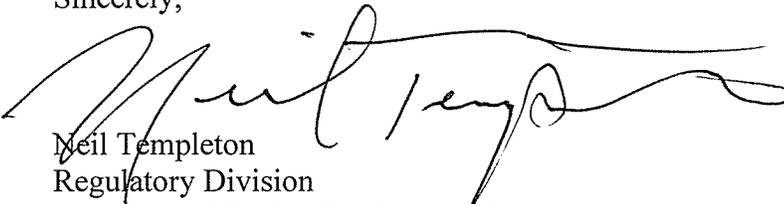
Mr. Robert Nelson
Montana Consumer Counsel
111 N. Last Chance Gulch Suite 1B
P.O. Box 201703
Helena, MT 59620-1703

RE: Data requests in Docket No. D2015.8.64

Dear Mr. Nelson,

Enclosed please find data requests of the Montana Public Service Commission to the Montana Consumer Counsel numbered PSC-030 through PSC-033 in the referenced Docket. Please begin the response to each new numbered data request on a new page. Please provide responses by December 9, 2015. If you have any questions, please contact me at (406) 444-6191.

Sincerely,



Neil Templeton
Regulatory Division
Montana Public Service Commission

Service Date: November 25, 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-030 THROUGH PSC-033 OF THE
MONTANA PUBLIC SERVICE COMMISSION
TO THE
MONTANA CONSUMER COUNSEL

PSC-030

Regarding: Avoided Cost Calculation
Witness: Stamatson

At 4:15 you refer to “Greycliff’s failure to attempt to calculate NWE’s avoided cost.”

Do you believe it would have been possible for Greycliff to attempt to calculate NorthWestern’s avoided cost? If so, please describe the methods and information that it should have employed.

PSC-031

Regarding: Placeholder Regulation Rate
Witness: Stamatson

At 7:12-13 you state that the corrected regulation rate could be incorporated into a PPA as a temporary placeholder.

Please provide examples of any PURPA tariffs or PPAs (that you are aware of or can find) that incorporate a rate as a temporary placeholder.

PSC-032

Regarding: Regulation Costs

Witness: Stamatson

At 7:16-17 you state that the regulation cost should be the current regulation cost set by the Commission during the life of the PPA.

- a. Are you aware of any of the issues that arose when the Commission created a fixed wind integration rate?
- b. Please confirm that NorthWestern's entire avoided cost rate is contained in Schedule QF-1. If not, please explain.
- c. Please explain the basis for treating wind integration apart (i.e., separate from) the avoided cost rate

PSC-033

Regarding: Wholesale Markets and Owned Generation

Witness: Stamatson

At 9:9-13 you testify that QF's were established to give small merchant generators access to markets at a time when organized wholesale markets didn't exist and utilities were biased toward their own resources.

Please explain whether the conditions of a lack of organized wholesale markets and utility bias toward owned generation still exist in the Western U.S., and describe the extent to which you believe these conditions have effect.