

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

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IN THE MATTER OF NorthWestern        )   REGULATORY DIVISION  
Energy's Application for Approval of    )  
Avoided Cost Tariff QF-1                )   DOCKET NO. D2016.5.39

**DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL  
TO NORTHWESTERN ENERGY**

MCC-001

Regarding:   Historic Electricity Prices  
Witness:     John B. Bushnell

- a.     On page eight of your testimony you state that because the 2015 Plan forecast does not start until 2016, historic electricity prices were used for the first three years. Why did NorthWestern Energy use historic electricity prices in the first three years of the model?
- b.     Please identify any previous dockets in which NorthWestern used historical electric prices to set avoided cost rates.

MCC-002

Regarding:   Avoided Cost of Capacity Before 2019  
Witness:     John B. Bushnell

On page nine of your testimony you state that the avoided cost of capacity is based on the levelized capital cost of an Internal Combustion Engine (ICE) generation unit to be built in 2019. How does NorthWestern Energy's avoided cost calculation account for the avoided cost of capacity before 2019?

MCC-003

Regarding: 85% Exceedance Level

Witness: John B. Bushnell

- a. On page 11 of your testimony you state that the 85% exceedance level was selected in part because it represents a level of reliability that is close to that of a Frame Combustion Turbine. Why wasn't the exceedance level calculated based on the reliability of an ICE unit, since that is the unit used to calculate the avoided cost of capacity?
- b. What would be the exceedance level if it were based on the reliability of an ICE unit?