NorthWestern Energy
Delivering a Bright Future

September 23, 2016

Mr. Will Rosquist
Administrator, Regulatory Division
Montana Public Service Commission
1701 Prospect Avenue
PO Box 2022601
Helena, Montana 59620-2601

Re: Docket No. D2016.5.39
QF-1 Avoided Cost Rate Filing
PNW Set 1 Data Requests (001-003)

Dear Mr. Rosquist:

Enclosed for filing is a copy of NorthWestern Energy's responses to the PNW Set 1 Data Requests in Docket No. D2016.5.39. It has been hand delivered to the Montana Public Service Commission and the Montana Consumer Counsel this date. It has also been e-filed on the PSC website, emailed to counsel of record, and sent via First Class Mail to the remainder of the service list.

Should you have questions please contact Joe Schwartzenberger at (406) 497-3362.

Sincerely,

Tracy Lowney Killoy

Tracy Lowney Killoy
Administrative Assistant

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's responses to the PNW Set 1 Data Requests (001-003) in Docket No. D2016.5.39, the QF-1 Avoided Cost Rate Filing, has been hand-delivered to the Montana Public Service Commission and the Montana Consumer Counsel this date. It has also been e-filed on the Commission website, emailed to counsel of record, and sent via First Class Mail to the attached service list.

Date: September 23, 2016

Tracy Lowney Killoy
Administrative Assistant
Regulatory Affairs

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Docket No. D2016.5.39

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NorthWestern Energy
Docket No. D2016.5.39
Application for Approval of Avoided Cost Tariff Schedule QF-1

Pacific Northwest Solar, LLC
Set 1 (001-003)

Data Requests received September 9, 2016

PNW-001 Regarding: Number of solar QF projects in the Interconnection Queue

a. Please identify the number of solar QF projects in the NWE Interconnection Queue as of the date NWE filed its Application in this Docket.

b. Please identify the number of solar QF projects in the NWE Interconnection Queue as of the date NWE filed its Emergency Motion in this Docket.

c. Please identify the number of solar QF projects in the NWE Interconnection Queue as of the date of the Notice of Commission Action on NWE's Emergency Motion in this Docket.

d. Please identify the number of solar QF projects in the NWE Interconnection Queue as of the date Autumn Mueller of NWE notified developers that: "The stay affects not only the execution of Purchase Power Agreements, but Interconnection Agreements. As long as the stay is in place, NorthWestern cannot execute a new Interconnection Agreement for any solar QF project between 100 kW and 3 MW in size seeking a contract at the standard long term rate. Although NorthWestern cannot currently execute any new Interconnection Agreements for such facilities, it will complete all contracted for study work necessary to preserve queue position for a requested interconnection. If, for any reason, you do NOT want NorthWestern to complete your study work, you need to advise us of that fact, via email, as soon as possible. However, if you do later decide you want an interconnection, you will have to reapply, and your queue position will be determined as of that date."

RESPONSE:

a. 41

b. 43

c. 39

d. 38

NorthWestern Energy
Docket No. D2016.5.39
Application for Approval of Avoided Cost Tariff Schedule QF-1

Pacific Northwest Solar, LLC
Set 1 (001-003)

Data Requests received September 9, 2016

PNW-002 Regarding: Separation of Interconnection and Contracting Groups

a. Please confirm that NWE's Contracting Group (dealing with Power Purchase Agreements) notified the Interconnection Group that Pacific Northwest Solar was seeking a specific Power Purchase Agreement under Schedule QF-1 and the date of such communication between those groups.

b. Please confirm whether NWE believes it is acceptable under FERC Guidelines to communicate between the Interconnection Group and Contracting Group at NWE.

c. Please provide the rationale of NWE in halting all interconnection efforts for only those solar QF projects seeking a Power Purchase Agreement under Schedule QF-1.

d. Please provide the rationale of NWE requiring developers to pursue all interconnection studies and then refusing to execute an interconnection agreement as being in conformance with FERC Guidelines.

e. Please provide the rationale of NWE requiring developers to pursue all interconnection studies and then refusing to execute an interconnection agreement as being in conformance with the Commission's rulings.

RESPONSE:

a. No, this information was not communicated or coordinated between the two groups.

b. Under the FERC Standards of Conduct, communications between these groups may or may not be acceptable depending on the nature of the conversation and the classification of the employees having the conversation.

c. NorthWestern was required to comply with the June 16, 2016, Notice of Commission action and the subsequent Order 7500. Providing interconnection agreements to developers who had tendered signed PPAs would have created LEOs in violation of the Commission's directives.

d. See the response to part c, above.

e. See the response to part c, above.

NorthWestern Energy
Docket No. D2016.5.39
Application for Approval of Avoided Cost Tariff Schedule QF-1

Pacific Northwest Solar, LLC
Set 1 (001-003)

Data Requests received September 9, 2016

PNW-003 Regarding: Execution of Schedule QF-1 Power Purchase Agreements

a. Please confirm the number of Schedule QF-1 Power Purchase Agreements NWE signed on or before February 15, 2016, and the dates of those signatures.

b. Please confirm the number of Schedule QF-1 Power Purchase Agreements between NWE and PNW that were signed by NWE on or before June 16, 2016.

c. Please confirm whether and how many Schedule QF-1 Power Purchase Agreements were executed by entities other than Pacific Northwest Solar between January 1, 2016 and June 16, 2016 that were also signed by NWE.

d. Please identify the dates when NWE signed any Schedule QF-1 Power Purchase Agreements executed by entities other than Pacific Northwest Solar between January 1, 2016 and June 16, 2016.

RESPONSE:

a. NorthWestern signed 46 Power Purchase Agreements ("PPA") in Montana before February 15, 2016, some of which were under Qualifying Facility Tariffs preceding the QF-1, and has shown the signature or PPA dates in the following table.

PNW-003 cont'd

Count	Facility	Signed or Dated
1	Colstrip Energy Limited Partnership	15-Oct-1984
2	Hydrodynamics Inc (South Dry Creek)	31-Oct-1984
3	Allen R. Carter (Pine Creek)	15-Nov-1984
4	Hydrodynamics Inc (Strawberry Creek)	15-Nov-1984
5	Wisconsin Creek Limited Partnership	16-Nov-1984
6	Donald Fred Jenni (Hanover Hydro)	26-Nov-1984
7	James Walker Sievers (Cascade Creek)	28-Nov-1984
8	James Walker Sievers (Barney Creek)	28-Nov-1984
9	Boulder Hydro Limited Partnership	13-Sep-1985
10	State of MT DNRC (Broadwater Dam)	30-Oct-1987
11	Yellowstone Energy Limited Partnership (BGI)	1-Mar-1991
12	Ross Creek Hydro LC	24-Jul-1996
13	Montana Marginal Energy	1-Jan-1998
14	Josef Staufer (Mission Creek)	1-Apr-1998
15	Mr. Thomas G. Agnew (Agnew Ranch)	1-Oct-2001
16	Boulder Hydro Limited Partnership	30-Jun-2003
17	Two Dot Wind LLC (Sheep Valley Ranch)	1-Sep-2003
18	Two Dot Wind LLC (Martinsdale Colony)	1-May-2004
19	Wisconsin Creek Limited Partnership	1-Jun-2004
20	Two Dot Wind LLC (Martinsdale Colony South)	1-Nov-2005
21	Two Dot Wind LLC (Moe Wind)	1-Dec-2005
22	Wisconsin Creek Limited Partnership	1-Jul-2007
23	Boulder Hydro Limited Partnership	1-Jul-2007
24	Mr. Thomas G. Agnew (Agnew Ranch)	1-Nov-2007
25	Two Dot Wind LLC (Martinsdale Colony)	23-Apr-2008
26	Two Dot Wind LLC (Sheep Valley Ranch)	23-Apr-2008
27	Two Dot Wind LLC (Moe Wind)	23-Apr-2008
28	Two Dot Wind LLC (Martinsdale Colony South)	24-Apr-2008
29	United Materials of Great Falls Inc	1-Jun-2008
30	United Materials of Great Falls Inc	21-May-2009
31	United Materials of Great Falls Inc	27-May-2010
32	Gerald Ohs (Pony Generating Station)	10-Dec-2010
33	Gordon Butte Wind LLC	21-Mar-2011
34	Musselshell Wind Project LLC	24-Mar-2011
35	Musselshell Wind Project Two LLC	24-Mar-2011
36	United Materials of Great Falls Inc	27-May-2011
37	Two Dot Wind Farm LLC	19-Aug-2011
38	Flint Creek Hydroelectric LLC	16-Jan-2012
39	Lower South Fork LLC	16-Jan-2012
40	Fairfield Wind LLC (Greenbacker)	22-Mar-2012
41	United Materials of Great Falls Inc	12-Apr-2012
42	Sleeping Giant Power LLC	2-Dec-2013
43	United Materials of Great Falls Inc	30-Apr-2014
44	Donald Fred Jenni (Hanover Hydro)	7-Oct-2014
45	Wisconsin Creek LTD LC	30-Oct-2014
46	Greenfield Wind LLC	26-Nov-2014

PNW-003 cont'd

b. As of June 16, 2016, NorthWestern was negotiating the completion of four PPAs with Pacific Northwest Solar LLC ("PNW").See also the response to Data Request FLS-014 in this docket.

c. NorthWestern signed four QF-1 PPAs between January 1, 2016 and June 16, 2016 with entities other than PNW. See also the response to Data Request FLS-014 in this docket.

d. NorthWestern signed the four QF-1 PPAs referred to in part c, above on June 8, 2016.