



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**  
**FLS Set 1 Data Requests (001-014)**

Dear Mr. Rosquist:

Enclosed for filing is a copy of NorthWestern Energy's responses to the FLS 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  
Administrative Assistant

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of NorthWestern Energy's responses to the FLS Set 1 Data Requests (001-014) 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

**Docket Service List  
Docket No. D2016.5.39**

**Will Rosquist  
Public Service Commission  
1701 Prospect Ave  
Helena MT 59620-2601**

**Jason Brown  
Montana Consumer Counsel  
PO Box 201703  
Helena MT 59620-1703**

**John Alke  
NorthWestern Energy  
208 N Montana Ave Suite 205  
Helena MT 59601**

**Tracy Lowney Killoy  
NorthWestern Energy  
11 E Park Street  
Butte MT 59701**

**Joe Schwartzberger  
NorthWestern Energy  
11 E Park Street  
Butte MT 59701**

**Jenny K Harbine  
Earthjustice  
313 East Main St.  
Bozeman MT 59715**

**DarAnne Dunning  
Luxan & Murfitt, PLLP  
P O Box 1144  
Helena MT 59624**

**Al Brogan  
NorthWestern Energy  
208 N Montana Ave Suite 205  
Helena MT 59601**

**Eric Christensen  
Cairncross Hempelmann  
524 Second Ave, Suite 500  
Seattle WA 98104**

**Mike J Uda  
Uda Law Firm, P.C.  
7 West Sixth Avenue  
Power Block West, Suite 4H  
Helena MT 59601**

**Ryan N. Meyer  
ElGuindy, Meyer & Koegel, PLLP  
2990 Lava Ridge Court, Suite 205  
Roseville CA 95661**

**Ryan R. Shaffer  
Meyer, Shaffer & Stepan, PLLP  
305 S. Fourth St. Suite 101  
Missoula MT 59801**

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

**FLS Energy, Inc.**  
**Set 1 (001-014)**

Data Requests received September 9, 2016

**FLS-001**      Regarding: Follow-up to PSC-004  
                    Witness: Mueller

In its responses to PSC-004, NorthWestern states that all interconnection customers “who were affected by the stay” of the QF-1 tariff were notified by email that NorthWestern could not execute an Interconnection Agreement for them.

- a.      How did NorthWestern’s transmission department identify which customers would be affected by the stay?
- b.      Please provide all internal documents reflecting NorthWestern’s internal communications regarding the transmission department’s identification of customers affected by the stay.

RESPONSE:

- a.      NorthWestern relied on advice of its legal counsel to determine who would be affected by the stay.
- b.      N/A

**NorthWestern Energy**  
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**FLS Energy, Inc.**  
**Set 1 (001-014)**

Data Requests received September 9, 2016

**FLS-002**      Regarding: Follow-up to PC-004  
                  Witness: Mueller

With regard to interconnection requests submitted by FLS, is it NorthWestern's position that it notified FLS, pursuant to Section 4.1 of the SGIP, of its inability to meet deadlines specified in its Small Generator Interconnection Procedures, including but not limited to the obligation to tender an executable Interconnection Agreement under SGIP Section 3.5.7?

- a.      If so, please provide all documentation reflecting notification provided to FLS pursuant to Section 4.1.
- b.      If so, was any such notification provided prior to issuance of the Notice of Commission Action ("NOCA") on June 16, 2016?
- c.      If not, please explain NorthWestern's rationale for not providing this notification.

RESPONSE:

- a.      Please see the "FLS-002a" folder on the attached CD.
- b.      Yes.
- c.      N/A

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**FLS Energy, Inc.**  
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**FLS-003**      Regarding: Interconnection agreements  
                  Witness: Mueller

Please provide all documents reflecting communications between NorthWestern and interconnection customers concerning the issuance (or refusal to issue) interconnection agreements, occurring on or after June 16, 2016.

RESPONSE:

NorthWestern provided the email that was sent to the following projects in its response to Data Request PSC-004c:

1. Martin Solar #215
2. River Solar #216
3. Glass Solar #219
4. Canyon Creek Solar #221
5. Malt Solar #222
6. Fox Farm Solar #223
7. Valley View Solar #225
8. Ulm Solar #231
9. Couch Solar #232
10. Chester Solar #241
11. Portage Solar #242
12. Benton Solar #243
13. Bootlegger Solar #246
14. Malta Solar #247
15. Fromberg Solar 1 #248
16. Loma Solar 1 #250
17. Malta Solar 1 #251
18. Cottonwood Solar #253
19. Bootlegger Solar 2 #254
20. Solar King #257
21. Stuckey Solar #259
22. Ulm Solar #262
23. Choteau Solar #263
24. Geraldine Solar #264
25. Great Falls Solar 1 #265
26. Bridger Solar 1 #266
27. Havre Solar 1 #267
28. Stanford Solar #272
29. Great Falls Solar 2 #274

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**FLS Energy, Inc.**  
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Data Requests received September 9, 2016

FLS-003 cont'd

30. Butte PV1 Solar #279
31. Dry Creek Solar #281
32. Lavina Solar #282
33. Gage Solar #283
34. Butte PV2 Solar #285
35. Toston PV1 Solar #289
36. Ulm Flats Solar #290

**NorthWestern Energy**  
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**FLS-004**      Regarding: Interconnection agreements  
                  Witness: Mueller

Has NorthWestern communicated with any employee or agent of the Montana Public Service Commission, including but not limited to the Public Staff, regarding NorthWestern's obligation and/or legal authority to issue Interconnection Agreements to Qualifying Facilities ("QFs") after issuance of the NOCA? If so, please provide all documents reflecting such communications.

RESPONSE:

No employee of NorthWestern's Transmission Department, including Ms. Mueller, had any discussions with the Montana Public Service Commission or its Staff regarding NorthWestern's legal obligation to provide interconnection agreements to FLS. The scope of NorthWestern's legal obligations, after the issuance of the NOCA, was determined by NorthWestern's legal department.

**NorthWestern Energy**  
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**FLS Energy, Inc.**  
**Set 1 (001-014)**

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**FLS-005**      Regarding: Interconnection agreements  
                    Witness: Mueller

Has NorthWestern tendered any executable Interconnection Agreements to solar qualifying facilities since June 16, 2016? If so, please identify the project(s) for which those agreements were tendered, the owner(s) of those projects, and the date(s) on which those executable agreements were tendered.

RESPONSE:

No.

**NorthWestern Energy**  
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**FLS Energy, Inc.**  
**Set 1 (001-014)**

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**FLS-006**      Regarding: Interconnection agreements  
                  Witness: Mueller

Has NorthWestern issued any executable Interconnection Agreements to non-solar qualifying facilities since June 16, 2016? If so, please identify the project(s) for which those agreements were tendered, the owner(s) of those projects, and the date(s) on which those executable agreements were tendered.

RESPONSE:

Yes, NorthWestern issued an executable LGIA to Crazy Mountain Wind, LLC on June 29, 2016. This is a 25-MW interconnection request.

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**FLS Energy, Inc.**  
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**FLS-007**      Regarding: Interconnection agreements  
                  Witness: Mueller

Has NorthWestern issued any executable Interconnection Agreements to non-QF generating facilities since June 16, 2016? If so, please identify the project(s) for which those agreements were tendered, the owner(s) of those projects, and the date(s) on which those executable agreements were tendered.

RESPONSE:

No.

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**FLS Energy, Inc.**  
**Set 1 (001-014)**

Data Requests received September 9, 2016

**FLS-008**      Regarding: Interconnection procedures  
                    Witness: Mueller

When an interconnection customer fails to meet any of the deadlines specified in the SGIP, is it NorthWestern's position that such failure justifies removal of the project from the interconnection queue?

If so:

- a.      Please specify the provision(s) of the SGIP on which this position is based.
- b.      Is it NorthWestern's position that an interconnection customer is not entitled to an opportunity to cure its failure to meet any deadline specified in the SGIP?
- c.      Is it NorthWestern's practice to provide advance notice to an interconnection customer that has failed to meet a deadline specified in the SGIP, prior to removing the customer's project from the interconnection queue?

RESPONSE:

- a.      If an interconnection customer failed to meet a financial obligation to NorthWestern under the SGIP, it would be removed from the queue in accordance with the SGIP. See for example SGIP ¶ 3.4.6.
- b.      If an interconnection customer fails to meet a financial obligation to NorthWestern under the SGIP, and is removed from the queue, it can reapply for interconnection when it is ready to meet the required financial obligation. It would lose its priority in the queue if there was a competing application for the same transmission capacity and the competing interconnection customer met its financial obligation under the SGIP.
- c.      No.

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**Set 1 (001-014)**

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**FLS-009**      Regarding: Power purchase agreements  
                  Witness: NorthWestern Legal Department

At the June 9, 2016, hearing on NorthWestern's Motion for Emergency Relief, Mr. Alke stated NorthWestern's position that in the absence of an order suspending the QF-1 tariff, NorthWestern was "obligated to enter into" power purchase agreements ("PPAs") with FLS as to which the parties had "reach[ed] agreement on the language of the PPA[.]" (June 9, 2016 hearing transcript at 58:11-24.) Please state the factual and/or legal basis for this position.

RESPONSE:

The basis for Mr. Alke's statements during oral argument to the Commission are set forth in the transcript of the oral arguments. Any legal research or analysis performed by Mr. Alke prior to his oral argument to the Commission is protected against disclosure by either the attorney client privilege, or the related attorney work product doctrine, and NorthWestern objects to this data request on those grounds should it be interpreted as seeking such information.

**NorthWestern Energy**  
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**FLS Energy, Inc.**  
**Set 1 (001-014)**

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**FLS-010**      Regarding: Power purchase agreements  
                    Witness: NorthWestern Legal Department

Is it NorthWestern's position that the test for a legally enforceable obligation ("LEO") articulated by the Commission in *Whitehall Wind*, Order No. 6444e, Dkt. D2002.8.100 (May 10, 2010) applies (or applied, prior to the suspension of the QF-1 tariff) to qualifying facilities seeking contracts under the QF-1 tariff? Please state the basis for this position.

- a.      Has NorthWestern, or any agent or employee thereof, ever communicated to a qualifying facility (or agent or employee thereof) that the *Whitehall Wind* test does not determine when a QF contracting under QF-1 rates establishes an LEO?
- b.      Has NorthWestern's position on this issue changed since issuance of the *Whitehall Wind* order? If so, what was the basis for NorthWestern's change(s) in position?

RESPONSE:

- a.      NorthWestern believes that the Commission's decision in the *Whitehall Wind* case is controlling on the issue of what constitutes an LEO in this case, and is unaware of any Commission decision which suggests otherwise. To the extent this data request can be interpreted as requesting documentation of NorthWestern's legal position in this case, NorthWestern objects to it as seeking information privileged against disclosure by the attorney client privilege or the related work product doctrine.
- b.      See the response to part a, above.

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**FLS Energy, Inc.**  
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**FLS-011**      Regarding: Contract negotiations  
                    Witness: Frank Bennett/Autumn Mueller

Please identify all projects for which FLS had tendered an executed PPA to NorthWestern on or before June 16, 2016.

- a.      Of the projects referenced above, please identify those for which FLS had communicated to NorthWestern, on or before June 16, 2016, FLS's intention to enter into an Interconnection Agreement.
- b.      If it is NorthWestern's position, with respect to any of the projects referenced above, that FLS had not communicated, on or before June 16, 2016, its intention to enter into an Interconnection Agreement with NorthWestern, please state the factual and legal basis for this position.
- c.      Is it NorthWestern's position that FLS did not commit to selling the output of the projects referenced above to NorthWestern, on or before June 16, 2016? If so, please state the factual and legal basis for this position.

RESPONSE:

- a.      FLS tendered 14 PPAs bearing its signature, two of which it later withdrew. (See first table below provided by Frank Bennett.)

It tendered no signed Interconnection Agreements because its interconnection requests were in various stages of study and review. Except for five interconnection requests for which it failed to meet its financial obligation as required by the SGIP (see second table below provided by Autumn Mueller), it would be fair to assume that FLS intended to enter into interconnection agreements for those of its projects which turned out to be financially and practically feasible.

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**FLS Energy, Inc.**  
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Data Requests received September 9, 2016

FLS-011 cont'd

**Project**

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Bear Gulch LLC  
Canyon Creek Solar LLC  
Couch Solar LLC (FLS request to withdraw project)  
Fox Farm LLC (FLS request to withdraw project)  
Glass Solar LLC  
Janney Solar LLC  
Malt Solar LLC  
Martin Solar LLC  
Middle Solar LLC  
River Solar LLC  
Sage Creek Solar LLC  
Sypes Canyon Solar LLC  
Ulm Solar LLC  
Valley View Solar LLC

Project	Status
Bear Gulch LLC	Interconnection request withdrawn for failure to meet financial obligations under SGIP
Canyon Creek Solar LLC	
Couch Solar LLC	(FLS request to withdraw project)
Fox Farm LLC	(FLS request to withdraw project)
Glass Solar LLC	
Janney Solar LLC	Interconnection request withdrawn for failure to meet financial obligations under SGIP
Malt Solar LLC	
Martin Solar LLC	
Middle Solar LLC	Interconnection request withdrawn for failure to meet financial obligations under SGIP
River Solar LLC	
Sage Creek Solar LLC	Interconnection request withdrawn for failure to meet financial obligations under SGIP
Sypes Canyon Solar LLC	Interconnection request withdrawn for failure to meet financial obligations under SGIP
Ulm Solar LLC	
Valley View Solar LLC	

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Data Requests received September 9, 2016

FLS-011 cont'd

- b. See the response to part a, above.
- c. It is NorthWestern's position that none of the FLS solar projects met the metrics of an LEO as required by the Commission's June 16, 2016, Notice of Commission Action, and its Order 7500.

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**FLS Energy, Inc.**  
**Set 1 (001-014)**

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**FLS-012**      Regarding: Interconnection queue  
                  Witness: Mueller

In prefiled direct testimony, Ms. Mueller states that at the time of her testimony, there were 43 active interconnection requests for solar projects 3 MW or less currently pending in NorthWestern's interconnection queue.

- a.      Of those 43 requests, how many are still pending in the interconnection queue? How much capacity do these still-pending requests represent?
  
- b.      Since the time of Ms. Mueller's testimony, how many additional interconnection requests for generating facilities has NorthWestern received? For each such request, please specify the date of the request, the generating capacity of the proposed facility, and type of generation (i.e., solar, hydro, natural gas) for the proposed facility.

RESPONSE:

- a.      There are 14 requests remaining, all of which are 3 MW requests totaling 42 MW.
  
- b.      There have been 25 new requests since this date. The detail is provided below:

**NorthWestern Energy**  
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**FLS Energy, Inc.**  
**Set 1 (001-014)**

Data Requests received September 9, 2016

FLS-012 cont'd

<b>Project Number</b>	<b>Date Request Received</b>	<b>Generation Type</b>	<b>Size</b>
276	May 3, 2016	Solar	3 MW
277	May 3, 2016	Solar	3 MW
278	May 3, 2016	Solar	3 MW
279	May 10, 2016	Solar	50 MW
280	May 18, 2016	Solar	298 kW
281	May 24, 2016	Solar	3 MW
282	May 24, 2016	Solar	3 MW
283	May 31, 2016	Solar	3 MW
284	June 1, 2016	Wind	80MW
285	June 1, 2016	Solar	3MW
286	June 1, 2016	Wind	18MW
287	June 1, 2016	Wind	20MW
288	June 1, 2016	Wind	20MW
289	June 8, 2016	Solar	3MW
290	June 22, 2016	Solar	3MW
291	June 28, 2016	Wind	20MW
292	July 1, 2016	Solar	3MW
293	July 1, 2016	Solar	3MW
294	July 1, 2016	Solar	3MW
295	July 1, 2016	Solar	2.2MW
296	July 1, 2016	Solar	3MW
297	July 1, 2016	Solar	3MW
298	July 8, 2016	Solar	339kW
299	July 11, 2016	Solar	70MW
300	July 11, 2016	Wind	500MW

**NorthWestern Energy**  
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**FLS Energy, Inc.**  
**Set 1 (001-014)**

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**FLS-013**      Regarding: Interconnection queue  
                 Witness: Mueller

In prefiled direct testimony, Ms. Mueller references “75 projects that have been issued pre-application reports” and “20 requests from [a] new developer.” How many of the projects referenced in this testimony have submitted interconnection requests? How many projects have been withdrawn by the developer or rejected by NorthWestern?

RESPONSE:

None of the projects referenced in this testimony have since submitted interconnection requests. Therefore, none have been withdrawn or rejected.

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**Set 1 (001-014)**

Data Requests received September 9, 2016

**FLS-014**      Regarding: Contract negotiations  
                  Witness: Bennett

How many executable PPAs for solar projects 3 MW or less were tendered to NorthWestern by QFs between May 17, 2016 and June 16, 2016? Please specify the date on which each PPA was tendered to NorthWestern; the other contracting party; and, if applicable, the date on which NorthWestern executed the PPA.

RESPONSE:

NorthWestern understands executable PPAs tendered as those PPAs NorthWestern had received that were proposed final PPA forms by the developer that were pending NorthWestern review, signature, and completion.

Please see the table below.

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FLS-014 cont'd

Developer	Standard Offer Facility	Date	Communication	Date	Communication	Date	Communication
CCR	Great Divide Solar LLC	6/3/2016	Final PPA with signature	6/8/2016	NWE signature	6/14/2016	PPA completed with effective Date
CCR	Fox Solar LLC	6/3/2016	Final PPA with signature	6/8/2016	NWE signature	6/14/2016	PPA completed with effective Date
CCR	Black Eagle Solar LLC	6/3/2016	Final PPA with signature	6/8/2016	NWE signature	6/14/2016	PPA completed with effective Date
CCR	Magpie Solar LLC	6/3/2016	Final PPA with signature	6/8/2016	NWE signature	6/14/2016	PPA completed with effective Date
CCR	Portage Solar LLC	6/6/2016	Final PPA with signature				
CCR	Chester Solar LLC	6/6/2016	Final PPA with signature				
PNW	Benton Solar	6/9/2016	Final signed signature page	6/2/2016	NWE signature		
PNW	Bootlegger Solar	6/9/2016	Final signed signature page	6/2/2016	NWE signature		
PNW	Manta Solar	6/9/2016	Final signed signature page	6/2/2016	NWE signature		
PNW	Choteau Solar	6/9/2016	Final signed signature page	6/2/2016	NWE signature		
PNW	Absarokee Solar	6/9/2016	Final signed signature page				
PNW	Boulder Solar	6/9/2016	Final signed signature page				
PNW	Chester Solar	6/9/2016	Final signed signature page				
PNW	Cottonwood Solar	6/9/2016	Final signed signature page				
PNW	Curry Solar	6/9/2016	Final signed signature page				
PNW	Dry Creek Solar	6/9/2016	Final signed signature page				
PNW	Dutton Solar	6/9/2016	Final signed signature page				
PNW	Gage Solar	6/9/2016	Final signed signature page				
PNW	Geraldine Solar	6/9/2016	Final signed signature page				
PNW	Goosebill Solar	6/9/2016	Final signed signature page				
PNW	Laredo Solar	6/9/2016	Final signed signature page				
PNW	Lavina Solar	6/9/2016	Final signed signature page				
PNW	Mills Solar	6/9/2016	Final signed signature page				
PNW	Railroad Solar	6/9/2016	Final signed signature page				
PNW	Stanford Solar	6/9/2016	Final signed signature page				
PNW	Stuckey Solar	6/9/2016	Final signed signature page				
PNW	Ulm Solar	6/9/2016	Final signed signature page				
FLS	Bear Gulch LLC	6/15/2016	Final PPA with signature				
FLS	Canyon Creek Solar LLC	6/15/2016	Final PPA with signature				
FLS	Couch Solar LLC	6/15/2016	Final PPA with signature				
FLS	Fox Farm LLC	6/15/2016	Final PPA with signature				
FLS	Glass Solar LLC	6/15/2016	Final PPA with signature				
FLS	Janney Solar LLC	6/15/2016	Final PPA with signature				
FLS	Malt Solar LLC	6/15/2016	Final PPA with signature				
FLS	Martin Solar LLC	6/15/2016	Final PPA with signature				
FLS	Middle Solar LLC	6/15/2016	Final PPA with signature				
FLS	Sypes Canyon Solar LLC	6/15/2016	Final PPA with signature				
FLS	Ulm Solar LLC	6/15/2016	Final PPA with signature				
FLS	Valley View Solar LLC	6/15/2016	Final PPA with signature				
FLS	Sage Creek Solar LLC	6/15/2016	Final PPA with signature				
FLS	River Solar LLC	6/16/2016	Final PPA Not Signed				

CCR is Cypress Creek Renewables  
PNW is Pacific Northwest Solar LLC  
FLS is FLS Energy Inc.