



October 28, 2016

Mr. Will Rosquist
Administrator, Regulatory Division
Montana Public Service Commission
1701 Prospect Ave.
P. O. Box 202601
Helena MT 59620-2601

RE: Docket No. D2016.5.39 – QF-1
NorthWestern Energy (NorthWestern) Data Requests to FLS Energy and Cypress Creek
Renewables
(NWE-013 through NWE-018)

Dear Mr. Rosquist:

Enclosed for filing is one copy of NorthWestern Energy's first set of data requests to FLS Energy and Cypress Creek Renewables (NWE-013-NWE-018).

These data requests will be hand delivered this day to the PSC and MCC, e-filed with the PSC, emailed to counsel of record and mailed to the service list.

If you have any questions, please call Joe Schwartzberger at (406) 497-3362.

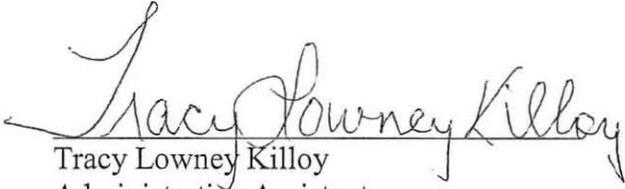
Sincerely,

Tracy Lowney Killoy
Administrative Assistant
Regulatory Affairs

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's first set of data requests to FLS Energy and Cypress Creek Renewables (NWE-013 to NWE-018) in Docket No. D2016.5.39 has been hand delivered to the Montana Public Service Commission and to the Montana Consumer Counsel this date. It has also been e-filed on the PSC website, emailed to counsel of record and mailed via first class to the service list.

Date: October 28, 2016


Tracy Lowney Killoy
Administrative Assistant
Regulatory Affairs

Docket Service List
Docket No. D2016.5.39

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

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

**NORTHWESTERN ENERGY'S FIRST SET OF
DATA REQUESTS TO FLS ENERGY AND CYPRESS CREEK RENEWABLES**

NWE-013 Subject: Workpapers

Provide in electronic format with all formulas intact all workpapers for Mr. Schiffman's testimony in this docket, including but not limited to:

- (a) His Table 2
- (b) All calculations and estimates in the text of his pre-filed testimony

NWE-014 Subject: Input and Output Data

Provide the original data sources for all inputs used by Mr. Schiffman in performing the various calculations in his pre-filed testimony and exhibit, and provide electronic versions, with all formulas intact, of all outputs of all calculations performed.

NWE-015 Subject: Previous Testimony

For each time Mr. Schiffman has testified as an expert witness on avoided costs in a jurisdiction other than Montana in the last five years provide complete copies of his testimony and exhibits.

NWE-016 Subject: Rejection of position

Identify by state, forum, and docket number the administrative proceedings in which Mr. Schiffman's advocacy on the calculation of avoided costs was rejected, in whole or in part, by the forum before which he testified.

NWE-017 Subject: Retention Agreement

Provide a complete copy of the contract or similar agreement under which Mr. Schiffman was retained to provide testimony in this docket.

NWE-018 Subject: Communications with MEIC and Vote Solar

Provide complete copies of all written communications in the last two years between FLS Energy and Cypress Creek Renewables (their agents and attorneys, including Mr. Schiffman), and either the Montana Environmental Information Center or Vote Solar (including their agents and attorneys).