



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 D2016.5.39 – QF-1  
NorthWestern Energy (NorthWestern) Data Requests to MEIC and Vote Solar, LLC  
(NWE-001 through NWE-012)

Dear Mr. Rosquist:

Enclosed for filing is one copy of NorthWestern Energy's first set of data requests to MEIC and Vote Solar, LLC (NWE-001-NWE-012).

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 MEIC and Vote Solar, LLC (NWE-001 to NWE-012) 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 VOTE SOLAR, LLC**

NWE-001 Subject: Workpapers

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

- (a) His Exhibit RTB-2
- (b) Each Table and Figure in his pre-filed testimony
- (c) All calculations in the text of his pre-filed testimony

NWE-002 Subject: Input and Output Data

Provide the original data sources for all inputs used by Mr. Beach in performing the various calculations and modeling contained in his pre-filed testimony and exhibits, and provide electronic versions, with all formulas intact, of all outputs of any modeling that was performed.

NWE-003 Subject: Referenced studies, reports, and IRPs

Provide complete copies of all studies, reports, IRPs, and similar writings referenced by Mr. Beach in his pre-filed testimony, and for which he did not provide a publicly available website from which the document can be obtained. See, for example, his Table 2, and his footnotes 27, 49, 51, 61, and 62.

NWE-004 Subject: Previous Testimony

Provide complete copies of the following testimony and exhibits referenced by Mr. Beach on the following pages of his Exhibit RTB-1.

- (a) Pg. 3, item 9 (Cal.)
- (b) Pg. 7, item 34 (Cal.)
- (c) Pg. 10, item 52 (Cal.)
- (d) Pg. 11, items 59 & 61 (Cal.)
- (e) Pg. 13, item 69 (Cal.)

NWE-005 Subject: Previous Testimony

Provide complete copies of the following testimony and exhibits referenced by Mr. Beach on the following pages of his Exhibit RTB-1.

- (a) Pg. 15, item 81 (Cal.)
- (b) Pg. 16, item 2 (Idaho)
- (c) Pg. 17, item 1 (North Carolina)
- (d) Pg. 18, item 1 (Utah)

NWE-006 Subject: Rejection of position

Identify by state and item, as shown in Mr. Beach's Exhibit RTB-1, the proceedings in which Mr. Beach's advocacy on behalf of solar energy or solar projects, was rejected, in whole or in part.

NWE-007 Subject: Retention Agreement

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

NWE-008 Subject: Communications with Solar Developers in Montana

Provide complete copies of all written communications in the last two years between the Montana Environmental Information Center/Vote Solar (their agents and attorneys, including Mr. Beach), and the following three solar developers in Montana (including their agents and attorneys): Cypress Creek Renewables, FLS, and Pacific Northwest Solar.

NWE-009 Subject: Calculations and Data Inputs

Please refer to Mr. Beach's testimony at page 12, line 13, through page 15, line 9. Show the derivations of every calculation in this segment of his testimony, including inputs, and provide the original data sources for the inputs. Provide electronic versions, with all formulas intact, of the spreadsheets or similar calculations used for this testimony segment.

NWE-010 Subject: Calculations and Data Inputs

Please refer to Mr. Beach's testimony at page 19, line 1 through page 28, line 6. Show the derivations of every calculation in this segment of his testimony, including inputs, and provide the original data sources for the inputs. Provide electronic versions, with all formulas intact, of the spreadsheets or similar calculations used for this testimony segment.

NWE-011 Subject: Calculations and Data Inputs.

Please refer to Mr. Beach's testimony at page 34, line 19, through page 37, line 2. Show the derivations of every calculation in this segment of his testimony, including inputs, and provide the original data sources for the inputs. Provide a complete and functional electronic copy of each and every model used to prepare this segment of testimony, and the outputs of every model run, including all measurements of error or accuracy.

NWE-012 Subject: Solar specific analysis

Provide all solar specific data in TMY, CSV, or SAM formats, used by Mr. Beach in the preparation of his testimony. For each solar specific model run provide an electronic version of the model, with formulas intact, showing all inputs, outputs, and measurements of error or accuracy.