

Montana Public Service Commission



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August 29, 2016

Mr. Joe Schwartzenberger
Regulatory Affairs Department
North Western Energy
11 East Park
Butte, MT 59701

RE: Data Requests in Docket D2016.5.39

Dear Mr. Schwartzenberger:

Enclosed please find Data Requests PSC-021 and PSC-022 of the Montana Public Service Commission to North Western Energy in the above-referenced Docket. Please provide a response by September 7, 2016. If you have any questions, please contact me at (406) 444-6191.

Sincerely,



Neil Templeton
Regulatory Division
Montana Public Service Commission

Enclosure

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

IN THE MATTER OF NorthWestern) REGULATORY DIVISION
Energy's Application for Interim and Final) DOCKET NO. D2016.5.39
Approval of Revised Tariff No. QF-1,)
Qualifying Facility Power Purchase)

**DATA REQUESTS PSC-021 AND PSC-022 OF THE MONTANA PUBLIC SERVICE
COMMISSION TO NORTHWESTERN ENERGY**

PSC-021

Regarding: Follow-Up to Response to PSC-004
Witness: Mueller

Section 4.1 of NorthWestern's Small Generator Interconnection Procedures, included as Attachment N to NorthWestern's FERC Electric Tariff, states:

Reasonable Efforts The Transmission Provider shall make reasonable efforts to meet all time frames provided in these procedures unless the Transmission Provider and the Interconnection Customer agree to a different schedule. If the Transmission Provider cannot meet a deadline provided herein, it shall notify the Interconnection Customer, explain the reason for the failure to meet the deadline, and provide an estimated time by which it will complete the applicable interconnection procedure in the process.

- a. Is it NorthWestern's position that Section 4.1 of its Small Generator Interconnection Procedures allows NorthWestern to follow interconnection process timeframes that deviate from the specific timeframes in its tariff if the Interconnection Customer agrees to those timeframes? If not, please explain.
- b. Is it NorthWestern's position that because the timeframes contained in the Attachment to the response to data request PSC-004 were provided to and discussed with representatives of Cypress Creek and FLS Energy that these entities agreed to those timeframes? If not, please explain.

- c. Please provide any written documentation NorthWestern possesses showing that Cypress Creek and FLS Energy specifically agreed to the process and timeframes contained in the Attachment to the response to data request PSC-004.
- d. Does “a deadline provided herein” refer to a deadline in the agreed to “different schedule”, to the five-day deadline of Section 3.5.7, or a deadline described elsewhere in the tariff?
- e. For all instances where NorthWestern failed to “meet a deadline provided herein”, please provide, or identify previously provided communications from NorthWestern to its interconnection customers that “explain the reason for the failure to meet the deadline, and provide an estimated time by which it will complete the applicable interconnection procedure in the process.”

PSC-022

Regarding: Follow-Up to Response to PSC-004

Witness: Mueller

Section 3.5.7 of NorthWestern’s Small Generator Interconnection Procedures, included as Attachment N to NorthWestern’s FERC Electric Tariff, states:

Upon completion of the facilities study, and with the agreement of the Interconnection Customer to pay for Interconnection Facilities and Upgrades identified in the facilities study, the Transmission Provider shall provide the Interconnection Customer an executable interconnection agreement with five business days.

- a. Please explain what constitutes “agreement of the Interconnection Customer to pay for Interconnection Facilities and Upgrades identified in the facilities study”.
- b. Please provide any documentation NorthWestern possesses showing whether or not either Cypress Creek or FLS Energy provided NorthWestern with such agreement.
- c. Is it NorthWestern’s position that an “executable interconnection agreement” must include construction timeframes that have been mutually agreed to by NorthWestern and the Interconnection Customer? If so, please provide the basis for this position with reference to FERC rules or NorthWestern’s FERC Electric Tariff.
- d. Would it have been possible for NorthWestern to provide an “executable interconnection agreement” containing construction schedules that NorthWestern deemed feasible within five business days? If not, please explain why. If so, please explain the reasons for the 30 day timeframe contained in the Attachment to the response to data request PSC-004.