

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

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IN THE MATTER of NorthWestern Energy's)	REGULATORY DIVISION
2011-2012 Electricity Supply Tracker)	DOCKET NO. D2012.5.49
)	ORDER NO. 7219

**CONCURRING OPINION OF
COMMISSIONER TRAVIS KAVULLA**

Inherent in the concept of a tracker mechanism is that similar accounts be treated similarly and that both revenues and expenses of an unanticipated variety be equally regarded. The proposed treatment in the tracker application at large, and the motion for interim rates in particular, of the Dave Gates Generation Station (DGGs) deferred account differs from the treatment suggested for NorthWestern's other deferred accounts. NorthWestern's suggestion that the DGGs deferred account balance is "immaterial" is only true inasmuch as it ordains a conclusion about the recoverability of the costs that is likely to be contested. Prefiled testimony of Cheryl A. Hansen, Annual Dave Gates Generation Station ("DGGs") True-Up, CAH-4, D2012.5.49. Therefore, the proposal to punt the DGGs account to another tracker entirely does not seem reasonable, nor is it reasonable to exclude it from consideration in interim treatment. That account should be taken up with other like accounts, or none of them should be taken up for consideration in this tracker. I propose, and intend to pursue, a discussion of all the deferred accounts in this docket, because it is and should be the purpose of a tracker to track costs on a monthly and annual basis.

Once intervenor testimony and data requests of the Commission and other parties have the effect of delineating what seem to be the contested issues of the proceeding, both in the deferred accounts and in the far larger category of Electricity Supply Costs, perhaps a Second Interim Order, should its issuance be desirable to parties and the Commission, can contemplate segregating those amounts which are subject to greater scrutiny from the larger numbers which are not. Until then, I believe this approach, while necessarily imprecise because of the early

stage of the proceeding and the resulting paucity of detail and identification of issues, is a fair one.

I CONCUR with the Order,

Travis Kavulla, Commissioner