

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

IN THE MATTER OF NorthWestern
Energy's Petition for a Waiver from
Compliance with the Community
Renewable Energy Project Purchase
Obligation for Calendar Year 2016

REGULATORY DIVISION

Docket No. D2017.8.65

IN THE MATTER OF NorthWestern
Energy's Consolidated Petition for a
Waiver from Compliance with the
Community Renewable Energy Project
Purchase Obligation for Calendar Year
2015 and for a Declaratory Ruling
regarding the Administrative Penalty
contained in Mont.
Code Ann. § 69-3-2004(10)

Docket No. D2016.4.33

**DIRECT TESTIMONY OF BRIAN FADIE ON BEHALF OF MONTANA
ENVIRONMENTAL INFORMATION CENTER AND NW ENERGY
COALITION**

DIRECT TESTIMONY OF

BRIAN FADIE

**ON BEHALF OF MONTANA ENVIRONMENTAL INFORMATION CENTER
AND NW ENERGY COALITION**

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1 **I. WITNESS INFORMATION**

2 **Q1. Please state your name and business address.**

3 A1. My name is Brian Fadie. My business address is 107 W. Lawrence St. #N-6, Helena,
4 Montana 59601.

5
6 **Q2. Who is your current employer and what is your position?**

7 A2. I am currently the Clean Energy Program Director for Montana Environmental
8 Information Center (“MEIC”).

9
10 **Q3. Please describe your education and work experience.**

11 A3. I received bachelor’s degrees in psychology and communication, with a specialization in
12 science, technology, and environmental public policy, from Michigan State University in
13 2009. During that time, I worked as the energy and environment correspondent for the
14 Michigan Policy Network as well as worked for the Michigan Department of Energy,
15 Labor, and Economic Growth concerning the department’s clean energy communication
16 efforts. In 2016, I received a master’s degree in environmental policy and planning from
17 the University of Michigan where coursework included study of energy markets,
18 environmental policy, natural resource law, climate policy, and environmental
19 economics. My capstone master’s project focused on renewable energy policy and
20 planning, culminating in a report for the Bureau of Land Management regarding the
21 Desert Renewable Energy Conservation Plan. Also in 2016, I joined the staff of MEIC as
22 the clean energy program director. Since then, I have participated in NorthWestern
23 Energy’s Electric Technical Advisory Committee.

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A copy of my CV is attached as Exhibit BF-1 to this testimony.

Q4. Have you previously testified on clean energy issues in any forum?

A4. Yes, I testified before the Montana Legislature during the 2017 regular legislative session and special legislative session regarding energy policy. This included testimony to the House Energy, Telecommunications, and Federal Relations Committee as well as the Senate Energy and Telecommunications Committee.

II. PURPOSE OF TESTIMONY

Q5. What is the purpose of your testimony?

A5. My testimony focuses on the cost cap provision of Montana’s Renewable Power Production and Rural Economic Development Act (“the Act”), Mont. Code Ann. § 69-3-2007, and how NorthWestern Energy has applied that cost cap provision for community renewable energy projects (“CREPs”) for compliance years 2015 and 2016. My testimony supports the conclusions that: (1) the cost cap provision requires a comparison between CREP eligible resources; (2) it is unreasonable for NorthWestern to expect CREPs to be cost-competitive with larger resources; (3) NorthWestern’s application of a cost-effectiveness standard to evaluate CREPs is unreasonable; and (4) NorthWestern’s avoided cost methodology in Docket No. D2017.8.65 is an unreasonable method for calculating the cost cap.

1 **III. THE RENEWABLE POWER PRODUCTION AND RURAL ECONOMIC**
2 **DEVELOPMENT ACT**

3 **Q6. When was the Renewable Power Production and Rural Economic Development Act**
4 **passed?**

5 A6. The Act originally passed in 2005.

6

7 **Q7. What is the overall purpose of the Act?**

8 A7. The purpose of the Act is most directly described by its title: “Montana Renewable Power
9 Production and Rural Economic Development Act.” The Act encourages production of
10 renewable energy in Montana with specific interest in seeing rural communities benefit
11 from economic development resulting from renewable energy projects. Regarding these
12 benefits, the Legislature found, “renewable energy production promotes sustainable rural
13 economic development by creating new jobs and stimulating business and economic
14 activity in local communities across Montana.” Mont. Code Ann. § 69-3-2002(2).

15

16 In passing the Act, the Legislature also recognized that “fuel diversity, economic, and
17 environmental benefits from renewable energy production accrue to the public at large,
18 and therefore, all consumers and utilities should support expanded development of these
19 resources to meet the state’s electricity demand and stabilize electricity prices.” Mont.
20 Code Ann. § 69-3-2002(4).

21

22

23

1 **Q8. What was the purpose of the Act’s CREPs requirement?**

2 A8. The Legislature included a CREPs requirement that was separate from and in addition to
3 the rest of the Act to help ensure that multiple local communities across Montana
4 benefited from the positive economic outcomes of renewable energy development. To
5 help meet this objective, the maximum size of a CREP was limited in size, first to 5
6 megawatts (“MW”) and later to 25 MW. Combined, NorthWestern Energy and
7 Montana-Dakota Utilities are required to acquire 75 MW of these projects. Mont. Code
8 Ann. § 69-3-2004(4)(b)(i).

9

10 **Q9. What is NorthWestern’s acquisition obligation under the CREPs requirement?**

11 A9. NorthWestern is required to acquire approximately 65 MW of CREPs. As of January
12 2018, NorthWestern has acquired approximately 25 MW of CREPs. Importantly, this
13 means that even utilizing maximum-sized CREPs of 25 MW, NorthWestern still needs to
14 acquire more than one project to become compliant.

15

16 **IV. COST CAP PROVISION**

17 **Q10. Please describe the cost cap provision of the Renewable Power Production and**

18 **Rural Economic Development Act.**

19 A10. The cost cap provision states that a public utility that has restructured pursuant to Title
20 69, chapter 8, such as NorthWestern, “is not obligated to take electricity from an eligible
21 renewable resource unless the eligible renewable resource has demonstrated through a
22 competitive bidding process that the total cost of electricity from the eligible resource,
23 including the associated cost of ancillary services necessary to manage the transmission

1 grid and firm the resources, is less than or equal to bids for the equivalent quantity of
2 power over the equivalent contract term from other electricity suppliers.” Mont. Code
3 Ann. § 69-3-2007(1).

4
5 This provision is designed as a cost containment mechanism to ensure that consumers are
6 protected from having to acquire a CREP at any cost.

7
8 **Q11. Is a cost cap standard the same as a least cost standard?**

9 A11. No. A “cost cap” is significantly different than “least cost.” Put simply, a least cost
10 standard drives a utility to pursue acquisition of the lowest possible cost resource.

11 However, to put a “cap” on something, such as cost of a resource, is to put a ceiling or
12 upper limit on cost. In this regard, rather than requiring a utility to select the lowest
13 possible cost resource, a cost cap instead grants a level of acceptance to a resource’s costs
14 as long as they fall under the ceiling.

15
16 **Q12. Are CREPs intended to be least cost resources?**

17 A12. No. “Least cost” is a well-known term and concept in utility regulation with a specific
18 goal as described above. If the Legislature intended CREPs to be least cost resources
19 then the cost containment language found in Montana Code Annotated § 69-3-2007
20 would have included this as a concept to be applied. Indeed, two current Commissioners
21 have previously recognized the distinction between CREPs and least cost resources.¹

¹ As Commissioners Koopman and Kavulla have noted, “the CREP standard in Montana imposes a requirement that departs from the least-cost, resource-neutral procurement exercise in which the Commission typically expects the utilities it regulates to engage. Instead, the CREP standard

1 **Q13. How then should CREP compliance with the cost cap provision be determined?**

2 A13. CREP proposals should only be compared to other CREP proposals obtained through a
3 competitive bidding process to determine cost cap compliance.

4

5 **Q14. Why should CREP proposals only be compared to other CREP proposals?**

6 A14. As previously noted, the CREP requirement was designed by the legislature with
7 characteristics to achieve identified goals. This resulted in a specific definition for what
8 qualifies as a CREP, which is distinct from any other resource NorthWestern traditionally
9 attempts to acquire.

10

11 First, CREPs are an eligible renewable resource, meaning they achieve the legislatively
12 declared benefits found in the Act's findings. See Mont. Code Ann. § 69-3-2002. This
13 distinguishes CREPs from other non-eligible generation resources that cannot be used to
14 satisfy a utility's obligation to acquire CREP-eligible resources.

15

16 Second, CREPs have a maximum size restriction (25 MW), encouraging an outcome
17 where multiple local communities benefit economically from the development of
18 renewable energy projects. Id. § 69-3-2003(4)(b). This size restriction physically
19 distinguishes CREPs from other resources, including even other eligible renewable

not only calls out which kinds of resources must be acquired, but specifies a size limitation and ownership structure that are unlikely to result in least-cost projects.” Dissenting Opinion of Comm’rs Travis Kavulla and Roger Koopman, at 2, Order 7334g, Docket No. D2013.10.77 (Dec. 17, 2014) (citations omitted).

1 resources (i.e. a project of 30, 50, or 100 MW in size cannot be a CREP regardless of
2 whether it is an eligible renewable resource or not).

3
4 A resource must meet these requirements in order to qualify as a CREP. Put another
5 way, only a CREP can be a CREP. Further, only by acquiring CREPs can NorthWestern
6 meet its statutory requirement. Acquisition of a non-CREP will not satisfy this
7 requirement. Therefore, because non-CREPs are ineligible to satisfy the CREP
8 requirement, they should not be used when determining whether specific CREP proposals
9 comply with the cost cap provision.

10
11 **Q15. Do you have any other support for your conclusion that CREPs should be compared**
12 **to CREPs for purposes of determining the cost cap?**

13 A15. Yes. In a similar context, FERC has corroborated that where a state has a renewable
14 energy requirement that requires purchase of renewable energy, it is not appropriate to
15 compare renewable energy to non-renewable energy for purposes of establishing avoided
16 costs or, as here, a cost cap. As FERC explained:

17 [I]f a state required a utility to purchase 10 percent of its energy
18 needs from renewable resources, then a natural gas-fired unit, for
19 example, would not be a source 'able to sell' to that utility for the
20 specified renewable resources segment of the utility's energy
21 needs, and thus would not be relevant to determining avoided costs
22 for that segment of the utility's energy needs.

23
24 Cal. Pub. Utils. Comm'n, 133 FERC ¶ 61,059, ¶ 27 (2010).

25
26 Indeed, NorthWestern acknowledged in a previous CREPs waiver docket that CREPs are
27 distinct and should be compared to other CREP-sized projects. See Order 7177b ¶ 32,

1 Docket No. D2011.6.53 (June 13, 2012) (discussing testimony in which NorthWestern’s
2 witness Mr. Fine “said his impression of the law’s purpose was to compare small, CREP-
3 sized projects with similarly sized acquisitions or purchases from the market”).
4

5 **V. NORTHWESTERN’S APPLICATION OF THE COST CAP PROVISION IN**
6 **D2016.4.33**

7 **Q16. How did NorthWestern evaluate CREP costs in D2016.4.33?**

8 A16. In D2016.4.33 (Compliance Year 2015), NorthWestern creates its own cost standard,
9 referred to as “cost effective,” which unreasonably relies on the concept of economies of
10 scale. Mr. LaFave testifies that “[t]he statutory requirement that NorthWestern purchase
11 the power and RECs from a specified number of megawatts of CREP generating capacity
12 is conditional – it only exists if there are cost effective CREP resources available to
13 NorthWestern with which it can meet the requirement.” B JL-7 (D2016.4.33). Thus,
14 NorthWestern appears to have used a “cost effective” standard, rather than the cost cap as
15 defined in the Act, to evaluate CREP proposals in the RFP process.
16

17 **Q17. Is “cost effective” defined or otherwise referenced in the Act?**

18 A17. No.
19

20 **Q18. How does NorthWestern define “cost effective” in its D2016.4.33 testimony?**

21 A18. NorthWestern largely uses the term “cost effective” to refer to economies of scale. Mr.
22 LaFave’s testimony states that “a CREP must be cost effective as measured by the cost

1 cap contained in the Act.” BJJ-7 (D2016.4.33). In the next sentence, Mr. LaFave
2 describes “cost effective” as follows:

3 Because of natural economies of scale, small or modest sized
4 *CREPs are seldom cost effective when measured against larger*
5 *scale renewable projects or more traditional utility-scale resources.*
6

7 Id. (emphasis added). Mr. LaFave twice more underscores NorthWestern’s interpretation
8 of “cost effective” as being determined by the size of a project, noting that:

9 Using the predominate form of eligible renewable energy as an
10 example, *a 5-MW wind farm simply is not going to pencil out as a*
11 *cost effective resource when compared to a 25-MW or a 40-MW*
12 *wind farm.*
13

14 Id. (emphasis added). And further stating that:

15 It is always going to be hard for CREP project developers to provide
16 cost effective renewable power when, by definition, that power is to
17 come from a small or modest sized renewable energy project that
18 *lacks economies of scale.*
19

20 BJJ-14 to BJJ-15 (D2016.4.33) (emphasis added).
21

22 **Q19. Does the cost cap contained in the Act refer to economies of scale or otherwise**
23 **comparing CREPs to larger scale renewable projects?**

24 A19. No. The cost cap only refers to conducting a “competitive bidding process” to determine
25 that “the total cost of electricity from that eligible resource ... is less than or equal to bids
26 for the equivalent quantity of power over the equivalent contract term from other
27 electricity suppliers.” Mont Code Ann. § 69-3-2007(1). Not only does the statute not
28 reference economies of scale or otherwise comparing CREPs to larger scale renewable
29 projects, the statute expressly provides that an eligible renewable resource should be
30 compared to “the equivalent quantity of power.” Id.

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It is important to re-emphasize that the Legislature specifically chose to limit the size of a CREP and that this was done in order to benefit multiple Montana communities with renewable energy development projects. By limiting the size of CREPs, the Legislature made a specific choice not to pursue economies of scale.

However, instead of recognizing this distinct characteristic of CREPs and its implications for the cost cap, Mr. LaFave’s testimony makes clear that NorthWestern’s interpretation of “cost effective” includes the separate concept of economies of scale.

Q20. Is it reasonable to compare CREPs, which are statutorily limited in size, to larger scale renewable projects?

A20. No. If this were reasonable then there would be no bounds to the size of a project that a CREP could be compared to, likely making the CREP requirement impotent. Just as a 100 MW coal plant would be unlikely to produce a unit of energy at a lower cost than a 1,000 MW coal plant, a 25 MW solar facility would be unlikely to produce a unit of energy at a lower cost than a 250 MW solar facility. Without an upper bound on size, such a comparison is possible and perhaps inevitable.

As discussed above, because the Legislature specifically chose not to pursue economies of scale with CREPs, any comparison of a 25 MW solar CREP to a 250 MW solar facility would be unreasonable on its face.

1 **Q21. Based on your review of the record, did NorthWestern use its “cost effective”**
2 **standard to evaluate CREP bids in the 2014 RFP process?**

3 A21. Although NorthWestern considered the cost effectiveness or “competitive cost” of bids,
4 see Ex. SEL-3, at 2, Ex. SEL-4, at 1 (D2016.4.33), it is unclear precisely how this “cost
5 effective” standard was used to evaluate CREP bids in the 2014 RFP process, see NWE
6 Response to MEIC-004(b).² To the extent that NorthWestern argues it should be granted
7 a waiver because CREPs are inherently not “cost effective” due to their lack of
8 economies of scale, as previously discussed, that is an unreasonable interpretation of the
9 cost cap provision.

10

11 **VI. NORTHWESTERN’S APPLICATION OF THE COST CAP PROVISION IN**
12 **D2017.8.65**

13 **Q22. How did NorthWestern apply the cost cap provision in D2017.8.65?**

14 A22. In D2017.8.65 (Compliance Year 2016), NorthWestern continues to emphasize the “cost-
15 effectiveness” of a project and applies a cost-effectiveness test, which it defines as “a
16 comparison of the cost of the project to the value such project provides to
17 NorthWestern’s portfolio.” See NWE Response to MEIC-001(b). In addition, in
18 D2017.8.65 NorthWestern also creates and applies its own cost standard referred to as a
19 “portfolio value.” See BJL-17-18 (D2017.8.65).

20

21

² Notably, the term “cost effective” appears 18 times in NorthWestern and its consultant’s D2016.4.33 testimony, whereas the term “cost cap” appears only once.

1 **Q23. What is portfolio value?**

2 A23. Portfolio value, sometimes called “model value” or “resource value” in testimony, is a
3 \$/MWh number that NorthWestern generates in-house and assigns to CREP proposals in
4 order to “evaluate[] the potential value of the CREP resources within NorthWestern’s
5 portfolio to establish the cost effectiveness of each project and its impact on customers.”
6 BJL-18 (Docket No. D2017.8.65).

7
8 **Q24. How is portfolio value calculated?**

9 A24. The process used to generate portfolio value is described in the prefiled direct testimony
10 of Luke P. Hansen and NWE’s responses to MEIC-002(a) and MEIC-003 as being almost
11 identical to the one used to calculate avoided cost in Qualifying Facility (“QF”) dockets.

12
13 **Q25. What is the difference between portfolio value and avoided cost?**

14 A25. NorthWestern notes two differences between portfolio value and avoided cost, however
15 neither makes the portfolio value conceptually different than avoided cost. The first
16 involves differences in the specific resource being avoided by a CREP (i.e. considering
17 only Colstrip Unit 4 versus considering Basin Creek, Colstrip Unit 4, and Dave Gates
18 Generating Station) while the second concerns application of the “Long-2” adjustment
19 mechanism. See LPH-5-6 (D2017.8.65); NWE Response to MEIC-003. While these
20 differences may affect the ultimate \$/MWh figure that is generated, they do not change
21 the underlying principle of an avoided cost calculation and thus do not indicate key
22 differences between the portfolio value calculated here and NorthWestern’s avoided cost
23 methodology as used to assess QFs.

1 Importantly, NorthWestern admits that the portfolio value methodology has not been
2 approved for evaluating CREPs, but points to its avoided cost methodology being
3 approved for use in QF dockets as evidence for its acceptance here. LPH-6
4 (D2017.8.65). However, in Order 7395d the Commission recognized that a CREP is
5 different than a QF and should be held to a different standard when considering its value
6 to NorthWestern.³

7
8 **Q26. Is portfolio value referenced in the cost cap provision of the Act?**

9 A26. No. As previously stated, the cost cap provision only refers to conducting a competitive
10 bidding process in order to determine compliance. It does not reference portfolio value.

11
12 **Q27. In your opinion, is it reasonable for NorthWestern to use portfolio value as reason
13 to claim CREP proposals do not meet the cost cap?**

14 A27. No. First, as previously stated, CREPs should only be compared with other CREPs when
15 determining compliance with the cost cap. Second, the cost cap provision plainly states
16 that CREPs are to be compared to other bids. See Mont. Code. Ann. § 69-3-2007. The
17 portfolio value calculation is a proprietary calculation conducted by NorthWestern
18 utilizing its own modeling and assumptions to create a fundamentally different metric
19 than a bid. Put simply, portfolio value is not a bid, and thus not the proper point of
20 comparison for determining compliance with the cost cap.

21

³ “In any case, Greycliff is not a QF, and the CREP standard imposes a positive obligation on utilities to procure electricity and RECs, notwithstanding the utility’s need for these resources.” Order 7395d ¶ 34, Docket No. D2015.2.18 (May 27, 2015).

1 Further, by using its PowerSimm software to create the portfolio value—a piece of
2 software and process that neither CREP bidders nor the Commission has access to—
3 bidders are left in the dark as to modeling techniques and what assumptions are being
4 made about their projects. It is unreasonable to require CREP bidders to achieve a
5 “good” portfolio value number if the process used to create it is unknown, out of their
6 control, and most importantly, inconsistent with the statutory cost cap provision.

7

8 **Q28. Does this conclude your testimony?**

9 A28. Yes, it does.

Exhibit BF-1

Brian Fadie

107 West Lawrence St. #N-6, Helena, MT 59601 • 406-443-2520 • bfadie@meic.org

EDUCATION

Master of Science, Natural Resources and Environment: Policy and Planning April 2016
Capstone Master's Project: Planning at the Landscape Scale – Lessons from the Desert Renewable Energy Conservation Plan
Coursework in energy markets and policy
University of Michigan, Ann Arbor, MI

Bachelor of Science, Psychology May 2009
Bachelor of Arts, Communication
Specialization in Science, Technology, and Environmental Public Policy
Michigan State University, East Lansing, MI

PROFESSIONAL EXPERIENCE

Clean Energy Program Director July 2016-Present
Montana Environmental Information Center, Helena, MT

- Lead MEIC in the development and implementation of a science-based program that results in adoption of innovative policies and results in increased conservation of energy and development of renewable sources of energy;
- Lobby on energy and other issues as necessary at the Montana Legislature and, when necessary, the U.S. Congress;
- Prepare written and visual materials, such as policy papers, fact sheets, action alerts, newsletter articles, and social media communications that demonstrate the importance and benefits of clean energy development;
- Coordinate with state, regional, and national organizations and individuals to develop public policies promoting energy efficiency and responsible renewable energy resources;
- Participate in the resource planning process for regulated utilities, including the Electric Technical Advisory Committee of NorthWestern Energy;
- Develop and conduct public outreach programs to build support for a clean energy future;
- Work in collaboration with conservation partners, government officials, agency personnel, Tribes, and other interest groups; and
- Develop strong working relationships with state, federal, tribal and local government officials and agency staff.

Clean Energy Government Relations (Summer Scholar) May 2015-August 2015
The Wilderness Society, Washington D.C.

- Produced research for government relations team synthesizing congressional legislation and administrative actions regarding renewable energy and transmission line development on public lands;
- Met with congressional and federal agency staff to discuss pending natural resource legislation and rulemakings, including securing cosponsors and signers for letters of support;
- Produced fact sheets and online material for use in congressional outreach and external communications.

Executive Director

November 2012-August 2013

ProgressNow Nevada and ProgressNow Nevada Action, Las Vegas, NV

- Managed program development and implementation for statewide, multi-issue 501c(3) and 501c(4) grassroots advocacy organizations during the 2013 Nevada legislative session;
- Built and leveraged relationships with policymakers, members of the media, volunteers, and other community organizations to accomplish programmatic goals.

Technology Director

October 2009-November 2012

ProgressNow Nevada and ProgressNow Nevada Action, Las Vegas, NV

- Created and managed online and offline issue advocacy campaigns, including web and social media strategy, volunteer recruitment and training, event planning, and media relations;
- Coordinated communication efforts among allied organizations during 2011 Nevada legislative session;

Clean Energy Communications Intern

May 2009-August 2009

Michigan Department of Energy, Labor & Economic Growth, Lansing, MI

- Created an online communication strategy to increase awareness of the department's renewable energy and energy efficiency policies and projects;
- Collaborated with the Office of the Governor on communication efforts related to creating a clean energy future for Michigan, including authoring material published on The Huffington Post .

Energy and Environment Correspondent

August 2008-May 2009

Michigan Policy Network, Michigan State University, East Lansing, MI

- Created policy briefs, blog entries, and other web content regarding energy and environmental legislation in Michigan.

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January, 2018, I caused the foregoing to be hand delivered to:

Justin Kraske
Chief Counsel/Administrator
Public Service Commission
1701 Prospect Ave.
Helena, MT 59620-2601

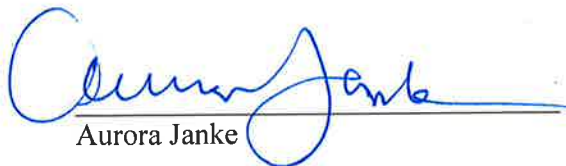
I further certify that on the same day, I served the foregoing by first-class mail, postage prepaid, on the following:

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