



February 27, 2015

Ms. Kate Whitney
Montana Public Service Commission
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

RE: Docket No. D2010.2.14
Gruba et al. Complaint
Updated responses to C-060, C-061, C-062, C-063, C-066, C-068, C-069, and C-073 in
Complainants' Second Set of Discovery Requests

Dear Ms. Whitney:

Enclosed for filing is a copy of NorthWestern Energy's updated responses in Complainants' Second Set of Discovery Requests. A hard copy will be mailed to the most recent service list in this docket this date. The Montana Public Service Commission and the Montana Consumer Counsel will be served by hand delivery this date. These data responses will also be e-filed on the PSC website and emailed to appropriate parties per Procedural Order No. 7084h.

Should you have questions please contact Joe Schwartzenberger at 406 497-3362.

Sincerely,

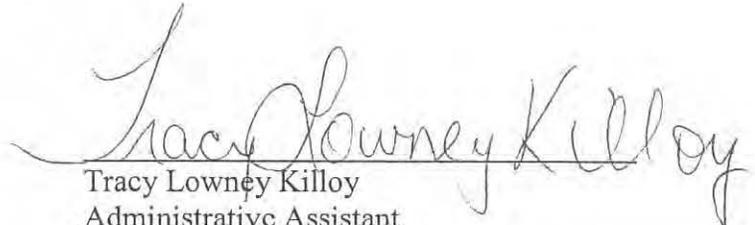
Tracy Lowney Killoy
Administrative Assistant
Regulatory Affairs

CC: Service List

CERTIFICATE OF SERVICE

I hereby certify that a copy of NorthWestern Energy's updated responses to C-060, C-061, C-062, C-063, C-066, C-068, C-069 and C-073 in Complainants' Second Set of Discovery Requests in Docket No. D2010.2.14 has been hand delivered to the Montana Public Service Commission and the Montana Consumer Counsel this date. They will be e-filed on the PSC website and served on the most recent service list by mailing a copy thereof by first class mail, postage prepaid. They will also be emailed to appropriate parties per Procedural Order No. 7084h.

Date: February 27, 2015


Tracy Lowney Killoy
Administrative Assistant
Regulatory Affairs

Utility Docket Service List
Docket D2010.2.14
Gruba Complaint

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NorthWestern Energy
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Complainants' Second Set of Discovery Requests
Set 2 (051-074)

Requests served by email February 27, 2014

C-060

I 16

Regarding: Clarification of NWE's billing practices.

Witness: Unknown (When "unknown appears, please indicate the witness who will attest to NorthWestern's response to the interrogatory.)

- 1) Please explain in detail what NorthWestern's LS billing charge pays for.

RESPONSE:

NorthWestern objects to this interrogatory on the basis of relevance and scope. Montana Rules of Civil Procedure, Rule 26(b)(1) provides that a party may only obtain discovery that "is relevant to any party's claim or defense" and "appears reasonably calculated to lead to the discovery of admissible evidence." This interrogatory seeks information about the billing charge in NorthWestern's ELDS-1 tariff for customer-owned street lights. In Order No. 7084f, ¶ 20, the Commission dismissed "any and all other claims asserted or alleged in the Amended Complaint that do not relate to the ownership charge claim." The ownership charge is applicable to NorthWestern-owned street lights. Thus, the scope of this docket is limited. Questions about the billing charge for customer-owned street lights do not relate and will not lead to discoverable information regarding whether NorthWestern's ownership charge is unjust and unreasonably discriminatory, the surviving claim in this docket, and therefore are not relevant or discoverable.

UPDATED RESPONSE (February 27, 2015):

NorthWestern provides this updated response pursuant to Order No.7084j issued by the Commission on February 13, 2015.

The billing charge is described in NorthWestern's ELDS-1 Electric Lighting Delivery Service tariff under the section entitled APPLICATION OF RATES. It states:

4. Billing Charge: For Customer-Owned lighting units, the monthly charge shall be the product of the number of units times the monthly Billing Charge set forth above under RATES.

As noted in the description above, the billing charge applies to customer-owned lighting units. It does not apply to utility-owned lighting units, which are the subject of this docket. The billing charge is intended to cover the cost of preparing and mailing monthly bills to customers who are served under the ELDS-1 tariff and own their lights.

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C-061

I 17

Regarding: Clarification of NWE's billing practices.

Witness: Unknown (When "unknown appears, please indicate the witness who will attest to NorthWestern's response to the interrogatory.)

- 1) Please explain in detail what NorthWestern's LS operations charge pays for and tell how that charge differs from the LS billing charge.

RESPONSE:

NorthWestern objects to this interrogatory on the basis of relevance and scope. Montana Rules of Civil Procedure, Rule 26(b)(1) provides that a party may only obtain discovery that "is relevant to any party's claim or defense" and "appears reasonably calculated to lead to the discovery of admissible evidence." This interrogatory seeks information about the billing charge in NorthWestern's ELDS-1 tariff for customer-owned street lights as well as information regarding the operations charge. In Order No. 7084f, ¶ 20, the Commission dismissed "any and all other claims asserted or alleged in the Amended Complaint that do not relate to the ownership charge claim." The ownership charge is applicable to NorthWestern-owned street lights. Thus, the scope of this docket is limited. Questions about the operations or billing charges do not relate and will not lead to discoverable information regarding whether NorthWestern's ownership charge is unjust and unreasonably discriminatory, the surviving claim in this docket, and therefore are not relevant or discoverable.

UPDATED RESPONSE (February 27, 2015):

NorthWestern provides this updated response pursuant to Order No.7084j issued by the Commission on February 13, 2015.

The operations charge is described in NorthWestern's ELDS-1 Electric Lighting Delivery Service tariff under the section entitled APPLICATION OF RATES. It states:

2. Operations Charge: For Utility-Owned lighting units, or where a customer has entered into an Operations Contract with the Utility, the monthly charge shall be the product of the number of units times the monthly Operations Charge set forth above under RATES.

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C-061 cont'd

The context and definition of the term, "operations" is set under the section entitled SPECIAL TERMS AND CONDITIONS.

4. Operations*:

- A. Where the Utility provides operations* services on Customer-Owned lights, such services shall be billed as set forth above under RATES, provided Customer has entered into an Operations Contract with the Utility. Reasonable care and diligence shall be exercised in relamping, replacing refractors, cleaning, testing, and performing such other items of an operations* nature so as to provide continuity of illumination. It shall be the responsibility of the Customer to notify the Utility of Lamp outages.
- B. Where Utility experiences excessive operations* costs as a result of vandalism; malicious acts; non-standard posts, poles or luminaries; or other causes of an unusual nature, the Utility may require Customer to pay the actual costs of repairing or replacing the damaged part(s) or unit(s). Such charges are in addition to the monthly charges set forth above under RATES.
- C. The Utility shall be responsible for supplying only lamps and refractors that are standard to those used on Utility-Owned light fixtures. For Customer-Owned lights, lamps and refractors of a special nature shall be supplied by the Customer at Customer's expense.
- D. * As used in this context, "operations" is intended to mean exclusively the labor and materials associated with relamping, cleaning luminaries, replacing broken or damaged refractors, and minor testing of circuitry. It does not include maintenance of the poles, conductors, luminaries, control(s), or protective system. Operations service does no (sic) include underground locating on Customer-Owned facilities.

See the updated response to C-060 for the description of the billing charge.

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C-062

I 18

Regarding: Clarification of NWE's billing practices.

Witness: Unknown (When "unknown appears, please indicate the witness who will attest to NorthWestern's response to the interrogatory.)

- 1) Please explain why one group of 34, 100 watt lights is noted separately from another 100 watt light on the same SILMD # 230, June 2009 bill to the City of Billings. If it is because the average original cost of the lights differs, please explain why that was the case.
- 2) Please indicate the original cost of each group of lights and the dates billing began for each group.

RESPONSE:

The witness is unknown at this time. NorthWestern will identify its witnesses upon filing of its testimony.

- 1) The group of 34 100-watt lights is noted separately on the bill from another single (1) 100-watt light in SILMD 230 because they were installed at different times. The 34 100-watt lights were installed in 1985 when the SILMD was initiated. The one (1) 100-watt light was installed 11 years later in 1996 at the request of the City of Billings. The fact that the average original cost of the lights differed had no impact on the light groupings.
- 2) NorthWestern objects to this interrogatory as not relevant because the ownership charge was not in effect at the time. Notwithstanding and without waiving such objection, NorthWestern provides this response: The original cost for installation of this group of 34 lights and of the single light does not exist in NorthWestern's electronic billing system or files. The actual date of billing for the original 34 lights cannot be determined from NorthWestern's electronic billing system or files. The original billing date for the single light was determined to be February 21, 1996 based on a paper note in a file.

UPDATED RESPONSE (February 27, 2015):

The Commission determined in Order No.7084j, issued February 13, 2015, that this question is relevant. The original response above is restated:

- 2) The original cost for installation of this group of 34 lights and of the single light does not exist in NorthWestern's electronic billing system or files. The actual date of billing for the original 34 lights cannot be determined from NorthWestern's electronic billing

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system or files. The original billing date for the single light was determined to be February 21, 1996 based on a paper note in a file.

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C-063

I 19

Regarding: Clarification of NWE's billing practices.

Witness: Unknown (When "unknown appears, please indicate the witness who will attest to NorthWestern's response to the interrogatory.)

- 1) Please explain why one group of 17, 100 watt lights has an ownership charge of \$15.72 and another 100 watt light in the same SILMD # 191 (June 2009 bill to the City of Billings has an ownership charge of \$12.95. If it is because the average original cost of the lights differs, please explain why that was the case. And tell why the cost for the entire SILMD was not averaged.
- 2) Please indicate the original cost of each group of lights and the dates billing began for each group.

RESPONSE:

The witness is unknown at this time. NorthWestern will identify its witnesses upon filing of its testimony.

- 1) The Electric Lighting Delivery Service Tariff ELDS-1 (Tariff) that first included rate design with the ownership charge was initially approved by Commission Order No. 5915a (Order) in Docket No. D96.3.33 for rates effective January 1, 1997. In accordance with the Order, like for all lights owned by NorthWestern at that time, the ownership charge for each 100-watt light in the group of 17 (installed in 1976) was determined based on the then-current cost of installation (marginal cost). The ownership charge for the single 100-watt light, which was installed subsequent to the Order in 2000, was determined based on the cost of installation at that time (marginal cost) in accordance with NorthWestern's then-current approved Tariff. The provision in the Tariff for assigning the ownership charge has not changed since the Tariff was approved by the Order.

The ownership charge on the June 2009 bill is different because the average costs per unit to install the lights at the time the respective ownership charges were determined per the Order placed the lights in different ownership cost ranges in the Tariff. NorthWestern is unable to identify all of the factors that might have been associated with the cost difference. However, one likely contributor is that the installation costs were determined at different times, and costs change over time.

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C-063 cont'd

There are no provisions in the Tariff for averaging the ownership charges for various groups of lights within an SILMD that are installed at different times and have different costs.

- 2) NorthWestern objects to this interrogatory as not relevant because the ownership charge was not in effect when the group of 17 lights was installed in 1976. Notwithstanding and without waiving such objection, NorthWestern provides this response: The original cost of installation and the date billing began for the group of 17 lights does not exist in NorthWestern's electronic billing system or files. Nor can the original cost of installation for the single light added in 2000 be determined from NorthWestern's electronic billing system or files. A letter from the City of Billings requested that the single light be added, and it was installed January 6, 2000.

UPDATED RESPONSE (February 27, 2015):

The Commission determined in Order No.7084j, issued February 13, 2015, that this question is relevant. The original response above is restated:

- 2) The original cost of installation and the date billing began for the group of 17 lights does not exist in NorthWestern's electronic billing system or files. Nor can the original cost of installation for the single light added in 2000 be determined from NorthWestern's electronic billing system or files. A letter from the City of Billings requested that the single light be added, and it was installed January 6, 2000.

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C-066

I 22

Regarding: Clarification of NWE's billing practices.

Witness: Unknown (When "unknown appears, please indicate the witness who will attest to NorthWestern's response to the interrogatory.)

- 1) Please explain how NorthWestern's Street light Account numbers are determined;
- 2) What the numbers mean; and
- 3) Whether or not this account numbering system is used for accounts that are not street or area lighting?

RESPONSE:

NorthWestern objects to this interrogatory on the basis of relevance and scope. Montana Rules of Civil Procedure, Rule 26(b)(1) provides that a party may only obtain discovery that "is relevant to any party's claim or defense" and "appears reasonably calculated to lead to the discovery of admissible evidence." This interrogatory seeks information about account numbers for street lighting. In Order No. 7084f, ¶ 20, the Commission dismissed "any and all other claims asserted or alleged in the Amended Complaint that do not relate to the ownership charge claim." Thus, the scope of this docket is limited. Questions about NorthWestern's street lighting account numbers do not relate and will not lead to discoverable information regarding whether NorthWestern's ownership charge is unjust and unreasonably discriminatory, the surviving claim in this docket, and therefore are not relevant or discoverable.

UPDATED RESPONSE (February 27, 2015):

NorthWestern provides this updated response pursuant to Order No.7084j issued by the Commission on February 13, 2015.

Account numbers for all NorthWestern customers, regardless of type of service, are generated by NorthWestern's billing system. Within the billing system, an account number links together the customer's name with the physical location where the customer receives service and is unique to that combination. The digits that comprise an account number have no particular meaning in and of themselves.

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C-068

I 24

Regarding: NWE's service to SILMD # 162.

Witness: Roe & Unknown (When "unknown appears, please indicate the witness who will attest to NorthWestern's response to the RFA.)

- 1) Please provide:
 - a. The per unit cost of the high pressure sodium luminaires installed in SILMD # 162 at the time of installation
 - b. The date billing began for the HPS luminaires that were installed in SILMD # 162.
 - c. Detail what other replacements to existing lighting facilities were included in the SILMD # 162 conversion from mercury vapor to HPS technology and the per unit and total cost of those replacements.
 - d. Information on what existing poles, pole extensions, wiring, or other infrastructure were used during the SILMD # 162 conversion to HPS to support and provide electricity to the HPS luminaires.
 - e. The date that all street lighting plant from the installation of mercury vapor lights in SILMD # 162 was completely amortized pursuant to PSC Order No. 4938a and provide the annual Montana Power report to the PSC showing the completion of the amortization and the account number where it is reported.
 - f. The original cost of the entire HPS installation in SILMD #162 not including any carryover of remaining undepreciated cost from previous alley lighting infrastructure.
 - g. The original cost of the HPS installation in SILMD #162 plus any carryover of remaining undepreciated cost from previous alley lighting infrastructure.

RESPONSE:

NorthWestern objects to this interrogatory and all of its discrete subparts on the basis of relevance and scope. Montana Rules of Civil Procedure, Rule 26(b)(1) provides that a party may only obtain discovery that "is relevant to any party's claim or defense" and "appears reasonably calculated to lead to the discovery of admissible evidence." This interrogatory seeks information about SILMD 162 and specifically information regarding the change in street lighting technology and the cost associated with that change. In Order No. 7084f, ¶ 20, the Commission dismissed "any and all other claims asserted or alleged in the Amended Complaint that do not relate to the ownership charge claim." Thus, the scope of this docket is limited. The ownership charges contained in NorthWestern's ELDS-1 tariff were first established by tariff in 1997. At the time of its approval in Docket No. 96.3.33, the ownership charge was based on installed costs at

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C-068 cont'd

that time (marginal costs). Therefore, questions about the SILMD 162 change in technology and the costs to change that technology before the ownership charge was approved do not relate and will not lead to discoverable information regarding whether NorthWestern's ownership charge is unjust and unreasonably discriminatory, the surviving claim in this docket, and therefore are not relevant or discoverable.

UPDATED RESPONSE (February 27, 2015):

NorthWestern provides this updated response pursuant to Order No.7084j issued by the Commission on February 13, 2015.

- a. NorthWestern does not have the information necessary to respond to this question. Notwithstanding that fact, NorthWestern's fixed asset accounting system classifies plant, which includes streetlights, by FERC account and summarizes the data by vintage and utility division. Therefore, NorthWestern does not maintain the historic detail necessary to respond to this question.
- b. See NorthWestern's updated response to C-041 (May 2, 2014).
- c. See the response to part a, above.
- d. See the response to part a, above.
- e. Please note that lighting plant is a tangible asset which is depreciated over its useful life. MPC used a 32-year depreciation life for lighting plant installed in 1970. During this time period, it should be noted that replacements may have been required. When an asset is replaced, the depreciation cycle restarts based on the then-current depreciation life, and the original asset is retired from the utility's books. The annual report provided to the PSC reflects the entire electric utility system. It does not detail each plant item. NorthWestern's 2002 annual report to the PSC is available on the PSC website at the following link:
http://www.psc.mt.gov/Docs/AnnualReports/2002_NWE_Elec.pdf. Refer to Schedules 19A and 20. The lighting plant is recorded in FERC Account No. 373.1 and is included in the total shown on line 28 of Schedule 19A. The accumulated depreciation reserve related to lighting plant is included in the total at line 13, Distribution on Schedule 20.
- f. See the response to part a, above.
- g. See the response to part a, above.

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C-069

I 25

Regarding: NWE's service to SILMD # 161.

Witness: Roe & Unknown (When "unknown appears, please indicate the witness who will attest to NorthWestern's response to the RFA.)

- 1) Please provide:
 - a. The per unit cost of the high pressure sodium luminaires installed in SILMD # 161 at the time of installation
 - b. The date billing began for the HPS luminaires that were installed in SILMD # 161.
 - c. Detail what other replacements to existing lighting facilities were included in the SILMD # 161 conversion from mercury vapor to HPS technology and the per unit and total cost of those replacements.
 - d. Information on what existing poles, pole extensions, wiring, or other infrastructure were used during the SILMD # 161 conversion to HPS to support and provide electricity to the HPS luminaires.
 - e. The date that all street lighting plant from the installation of mercury vapor lights in SILMD # 161 was completely amortized pursuant to PSC Order No. 4938a and provide the annual Montana Power report to the PSC showing the completion of the amortization and the account number where it is reported.
 - f. The original cost of the HPS installation in SILMD #161 not including any carryover of remaining undepreciated cost from previous street lighting infrastructure.
 - g. The original cost of the HPS installation in SILMD #161 plus any carryover of remaining undepreciated cost from previous street lighting infrastructure.

RESPONSE:

NorthWestern objects to this interrogatory and all of its discrete subparts on the basis of relevance and scope. Montana Rules of Civil Procedure ("M. R. Civ. P."), Rule 26(b)(1) provides that a party may only obtain discovery that "is relevant to any party's claim or defense" and "appears reasonably calculated to lead to the discovery of admissible evidence." This interrogatory seeks information about SILMD 161 and specifically information regarding the change in street lighting technology and the cost associated with that change. In Order No. 7084f, ¶ 20, the Commission dismissed "any and all other claims asserted or alleged in the Amended Complaint that do not relate to the ownership charge claim." Thus, the scope of this docket is limited. The ownership charges contained in NorthWestern's ELDS-1 tariff were first established by tariff in 1997. At the time of its approval in Docket No. 96.3.33, the ownership charge was based on installed costs at that time (marginal costs). Therefore, questions about

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C-069 cont'd

the SILMD 161 change in technology and the costs to change that technology before the ownership charge was approved do not relate and will not lead to discoverable information regarding whether NorthWestern's ownership charge is unjust and unreasonably discriminatory, the surviving claim in this docket, and therefore are not relevant or discoverable.

f. and g.:

NorthWestern is not required to respond to these subparts of this interrogatory. M. R. Civ. P. 33(a)(1) provides that "...a party may serve on any other party no more than 50 written interrogatories, including all discrete subparts." All interrogatories and discrete subparts considered to date from Complainants, these subparts f and g are the 51st and 52nd interrogatories; subpart e is the 50th interrogatory propounded by Complainants in this docket.

UPDATED RESPONSE (February 27, 2015):

NorthWestern provides this updated response pursuant to Order No.7084j issued by the Commission on February 13, 2015.

- a. See the response to C-068a.
- b. See NorthWestern's updated response to C-041 (May 2, 2014).
- c. See the response to C-068a.
- d. See the response to C-068a.
- e. See the response to C-068e.

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C-073

RPD 7

Regarding: NWE's ownership charge tariff.

Witness: Unknown (When "unknown appears, please indicate the witness who will attest to NorthWestern's response to the RFA.)

- 1) Please provide a copy of tariff pages containing any numerical changes to any street lighting ownership charge tariff that Montana Power or NorthWestern had between 1982 and the present.

RESPONSE:

The witness is unknown at this time. NorthWestern will identify its witnesses upon filing of its testimony.

NorthWestern objects to this request for production of documents on the basis of relevance and scope. Montana Rules of Civil Procedure ("M. R. Civ. P."), Rule 26(b)(1) provides that a party may only obtain discovery that "is relevant to any party's claim or defense" and "appears reasonably calculated to lead to the discovery of admissible evidence." This request seeks copies of NorthWestern's street lighting tariffs from 1982 to the present when any street lighting ownership charge in the tariff changed. In Order No. 7084f, ¶ 20, the Commission dismissed "any and all other claims asserted or alleged in the Amended Complaint that do not relate to the ownership charge claim." Thus, the scope of this docket is limited. The ownership charges contained in NorthWestern's ELDS-1 tariff were first established by tariff in 1997. Therefore, questions about Commission-approved tariffs prior to 1997 do not relate and will not lead to discoverable information regarding whether NorthWestern's ownership charge is unjust and unreasonably discriminatory, the surviving claim in this docket, and therefore are not relevant or discoverable.

Notwithstanding and without waiving said objection, NorthWestern provides the following response: These documents are filed with and approved by the Montana Public Service Commission. As such, they are public documents that Complainants are able to view and copy at the office of the Commission. Also, pursuant to the Montana Rules of Civil Procedure, Rule 34, NorthWestern would make the relevant copies of tariffs after 1997 including changes to the ownership charge available for inspection and copying at its offices located at 40 E. Broadway, Butte, Montana.

UPDATED RESPONSE (February 27, 2015):

The Commission determined in Order No.7084j, issued February 13, 2015, that this question is relevant. The original response above is restated, modified slightly to reflect the order:

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C-073 cont'd

These documents are filed with and approved by the Montana Public Service Commission. As such, they are public documents that Complainants are able to view and copy at the office of the Commission. Also, pursuant to the Montana Rules of Civil Procedure, Rule 34, NorthWestern would make the relevant copies of tariffs that include a change to the ownership charge available for inspection and copying at its offices located at 40 E. Broadway, Butte, Montana.