

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

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

**DATA REQUESTS MCC-004 THROUGH MCC-009 OF THE
MONTANA CONSUMER COUNSEL
TO NORTHWESTERN ENERGY**

MCC-004

Regarding: Exhibit JBB-2
Witness: John B. Bushnell

Please provide page 4 of Exhibit JBB-2 (showing capacity costs based on an ICE unit) with any errors corrected.

MCC-005

Regarding: Environmental Attributes
Witness: John B. Bushnell

To quantify NorthWestern's proposed \$/kWh rates for environmental attributes, please calculate the difference between columns on pages 3 and 4 of Exhibit JBB-4 (i.e., for both "Avoided Cost of Energy" and "Levelized Energy Rate by Contract Length" columns), for each resource type (i.e., for "hydroelectric and other," "intermittent wind," and "intermittent solar") and each year.

MCC-006

Regarding: Capacity Credit for Solar
Witness: John B. Bushnell

Please explain why NorthWestern calculated a ten-year capacity credit for solar using a nameplate capacity of 2.612MW instead of 3MW. *See* JBB-12, Ex. JBB-6.

MCC-007

Regarding: Line Losses
Witness: Michael R. Cashell

On page 7 of your Rebuttal Testimony you state “Adding intermittent generating resources at the distribution level on NorthWestern’s system does not decrease transmission costs.”

- a. Do you consider line losses to be “transmission costs” at either the transmission or distribution levels?
- b. Could adding small solar projects to certain parts of the transmission and /or distribution systems decrease total line losses over a given period of time?
- c. Please describe NorthWestern’s situational awareness of actual line losses on its system and specifically indicate whether NorthWestern knows what its actual line losses are at any given point in time or over a given amount of time. To the extent NorthWestern can calculate or estimate its current line losses, please provide those calculations or estimates for a recent period.

MCC-008

Regarding: Levelized Energy Rates
Witness: Luke P. Hansen

Please explain why the levelized energy rates for hydro are lower than the levelized energy rates for wind and solar on page 9 of your Rebuttal Testimony.

MCC-009

Regarding: Carbon Price
Witness: Luke P. Hansen

Please explain why only 60% of the carbon price should be removed to calculate “an energy rate without carbon” instead of 100%. *See* LPH-10.