

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)

**PREHEARING MEMORANDUM
OF THE MONTANA CONSUMER COUNSEL**

In accordance with Procedural Order 7500a, the Montana Consumer Counsel ("MCC") submits its prehearing memorandum.

I. CONTESTED ISSUES

MCC identifies the following contested issues in this docket:

1. What energy and capacity costs would future small qualifying facilities ("QFs") allow NorthWestern Energy to avoid, and what methodology should be used to calculate these energy and capacity costs;
2. Should the Montana Public Service Commission set standard rates reflecting the value of environmental attributes, in addition to standard rates reflecting the avoided cost of energy and capacity; and
3. To the extent actual integration costs for small wind and solar projects turn out to be higher than assumed in standard rates for small QFs, should ratepayers be responsible for these costs in future cost recovery proceedings?

II. UNCONTESTED ISSUES

MCC is not aware of any issues raised in this proceeding that are not contested.

III. WITNESSES

MCC will call Jaime T. Stamatson.

III. EXHIBITS

MCC will offer the Direct Testimony of Jaime T. Stamatson as Exhibit MCC – 1, and the Additional Issues Testimony of Jaime T. Stamatson as MCC – 2. MCC reserves the right to introduce other exhibits at the hearing as may become necessary.

IV. RESPONSES TO DATA REQUESTS AND ADDITIONAL EXHIBITS

MCC does not object to any motion for admission into the record of all data responses filed in this docket, including all exhibits thereto and all material referenced in the responses, consistent with the Commission's past practice. MCC reserves the right to introduce any other exhibits identified, referenced or relied upon in the testimony or by any party in this proceeding.

V. SPECIAL SCHEDULING NEEDS

MCC has no particular scheduling needs.

Respectfully submitted January 17, 2016.



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