

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

IN THE MATTER OF NorthWestern Energy’s) REGULATORY DIVISION
Petition for a Waiver from Compliance with the)
Community Renewable Energy Project Purchase) DOCKET NO. D2016.4.33
Obligation for Calendar Year 2015 and for a)
Declaratory Ruling regarding the Administrative)
Penalty contained in Mont. Code Ann. § 69-3-)
2004(10).)

IN THE MATTER OF NorthWestern Energy’s) DOCKET NO. D2017.8.65
Petition for a Waiver from Compliance with the)
Community Renewable Energy Project Purchase)
Obligation for Calendar Year 2016.)

DATA REQUESTS PSC-011 THROUGH PSC-017 OF THE
MONTANA PUBLIC SERVICE COMMISSION TO
NORTHWESTERN ENERGY

PSC-011

Regarding: 2014 CREP negotiations with Invenergy
Witness: LaFave at BJJ-5-BJJ-6

- a. What were the timing issues that arose during negotiations for Tiger Butte or Judith Gap II that led to concerns over potential completion date delays?
- b. Other than issues related to timing and the potential loss of PTCs, please identify and explain what “other concerns” increased during the Tiger Butte negotiations.
- c. Please confirm which party took the initiative to terminate negotiations when negotiations between NorthWestern and Invenergy ended in October 2014.

PSC-012

Regarding: Existing QF CREP proposal
Witness: LaFave at BJJ-9

What upgrades would have been required for the QF that submitted a proposal in response to the 2014 RFP that were not required for the proposal’s existing QF contract?

PSC-013

Regarding: Cost cap provision
Witness: LaFave at BJJ-11

Please explain how NorthWestern's method for evaluating cost effectiveness of CREP proposals compares the CREP bids and associated costs of ancillary services to bids for an equivalent quantity of power over an equivalent contract term from other electricity suppliers.

PSC-014

Regarding: Commercial operation date
Witness: LaFave at BJJ 8

How close to an online date does a CREP proposal need to be in order for NorthWestern to determine cost-effectiveness of a proposal? Please explain.

PSC-015

Regarding: 2014 RFP project dismissals
Witness: LaFave at BJJ-6

- a. Please specify any project proposals with commercial operation dates beyond 2015 that were dropped from consideration by NorthWestern because they were judged to be insufficiently developed.
- b. Please specify any project proposals with commercial operation dates beyond 2015 that were dropped from consideration by NorthWestern because they were judged to not be cost effective.
- c. Please specify any project proposals with commercial operation dates beyond 2015 that were dropped from consideration by NorthWestern because the project developers withdrew their projects from consideration.

PSC-016

Regarding: 2015 RFP unanswered cost questions
Witness: LaFave at BJJ-7

Please identify the specific project proposals that NorthWestern dropped from consideration because they could not be online by the end of 2016 due to unanswered cost questions.

PSC-017

Regarding: Commission view on CREP risk
Witness: LaFave at BJJ-7

You state "there is too much uncertainty regarding what this Commission believes is or is not reasonable risk for customers as it relates to CREP resources." Please explain this statement, and support with evidence where necessary.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a copy of the Data Requests PSC-011 through PSC-017 of the Montana Public Service Commission to NorthWestern Energy issue on March 7, 2018 in D2016.4.33 was served upon the following, by mailing a true and correct copy, via first class mail, on the 7th day of March 2018, addressed as follows:

Robert Nelson
Jason Brown
Montana Consumer Counsel
111 N. Last Chance Gulch, Ste. 1B
P.O. Box 201703
Helena, MT 59620-1703

Al Brogan
John Alke and Sarah Norcott
NorthWestern Energy
208 N. Montana, Suite 205
Helena, MT 59601

Jenny K. Harbine and Aurora R. Janke
Earthjustice
313 East Main St.
Bozeman, MT 59715

_____/s/Sydney Kessel_____
Sydney Kessel, Administrative Assistant

Email addresses

Robert Nelson
Jason Brown
Montana Consumer Counsel
robnelson@mt.gov;
jbrown4@mt.gov;
ssnow@mt.gov;

NorthWestern Energy
joe.schwartzberger@northwestern.com;
john.alke@northwestern.com;
al.brogan@northwestern.com;
tracy.killoy@northwestern.com
sarah.norcott@northwestern.com

EarthJustice
JHarbine@earthjustice.org
AJanke@earthjustice.org