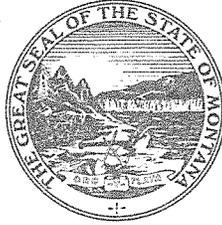


# Montana Public Service Commission



Brad Johnson - Chairman  
Travis Kavulla - Vice Chairman  
Roger Koopman - Commissioner  
Bob Lake - Commissioner  
Tony O'Donnell - Commissioner

February 8, 2018

Mr. Jed D. Henthorne  
President and General Manager  
Energy West Montana, Inc.  
PO Box 2229  
Great Falls, MT 59403

RE: Data requests in Docket D2017.12.89

Dear Mr. Henthorne,

Enclosed please find data requests of the Montana Public Service Commission to Energy West Montana, Inc. numbered PSC-001 through PSC-022 in the above referenced Docket. Please begin the response to each new numbered data request on a new page. Please provide responses on or before February 22, 2018. If you have any questions, please contact me at (406) 444-6182.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Arnold', with a long horizontal flourish extending to the right.

Robin Arnold  
Analyst, Regulatory Division  
Montana Public Service Commission

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

IN THE MATTER of Energy West Montana,                    )    REGULATORY DIVISION  
Inc.'s Application for an Order Approving its            )  
Reconciliation of the Collections and                    )    DOCKET NO. D2017.12.89  
Disbursements of West Yellowstone's No Interest    )  
Loan Program

**DATA REQUESTS PSC-001 THROUGH PSC-022 OF  
THE MONTANA PUBLIC SERVICE COMMISSION  
TO ENERGY WEST MONTANA, INC.**

PSC-001

Regarding: "Total Collections and Beginning Balances"

Witness: Henthorne, Exhibit JDH-1

- a. Please confirm that the values given as "Total Collections and Beginning Balances" (line 4) of each annual column in Exhibit JDH-1 represent the sum of the value of the "Net EWM-Well USB Program Balance" from the previous year (line 16) and the value of total collections from the West Yellowstone NIP rate of the current year.
- b. If the derivation of "Total Collections and Beginning Balances" cannot be confirmed as described in (a), please explain how the value of "Total Collections and Beginning Balances" (line 4) is determined.
- c. If the answer to (a) is confirmed, please revise and re-submit Exhibit JDH-1 by adding two lines, "Total Collections" and "Previous Balances," which should total to line 4. Please update line 6, "Actual Percentage Collected," using the new "Total Collections" line and the "Total Sales Revenue" line.

PSC-002

Regarding: West Yellowstone NIP loan details

Witness: Henthorne

- a. In the revised and re-submitted Exhibit JDH-1, requested in PSC-001, please insert two new lines of data related to the West Yellowstone NIP loans: one line should include the total number of new NIP loans executed for each year, and the other line should include the sum of all NIP loan amounts for the loans executed for each year.
- b. As an attachment to Exhibit JHD-1, please provide a detailed list of the loans made to participants in the West Yellowstone NIP, by year, for the time period February 1, 1997, through November 30, 2006. For each loan, please include the stated interest rate, the APR, the interest paid, and the duration of the loan.

c. Please confirm that for each loan referenced in (b), EWM-West Yellowstone was responsible for paying the interest associated with the loan(s).

PSC-003

Regarding: "Total Collections and Beginning Balances" in 1997  
Witness: Henthorne, Exhibit JDH-1

a. Because the figure of \$19,378.11 shown on line 14 for 1997 is shown as a positive amount, does this indicate that EWM-Great Falls transferred this amount to EWM-West Yellowstone?

b. If the answer to (a) is yes, please explain the source of funds and specific accounts used for the transfer of \$19,378.11 from Great Falls to West Yellowstone in line 14 for 1997 in Exhibit JDH-1. Please specify if the source and account was used as part of the \$9,901.52 amount shown on line 9 of Exhibit JDH-1, or if it was used as part of the \$9,570.82 amount shown on line 10.

c. How was the \$19,472.34 (line 12 of 1997 column in Exhibit JDH-1) spent? Please explain the programs, the expenditures for each, and the time frame of the expenditures.

PSC-004

Regarding: West Yellowstone NIP bank fees  
Witness: Henthorne, Exhibit JDH-1

a. Please explain why, particularly in 1997 and 1998, and again in some subsequent years, West Yellowstone both paid a portion of the NIP bank fees and interest directly to the bank, and transferred money to Great Falls, which also paid a portion of the total bank fees and interest charges in those years?

b. With regard to the years when amounts paid out (Lines 9 and 10 in Exhibit JDH-1) were credited to both West Yellowstone and Great Falls (1997, 1998, 2000, 2002, 2003, and 2007-1), please explain how the respective portions of the "Total Amounts Paid Out to USB Programs" (line 12) allocated to West Yellowstone and Great Falls?

PSC-005

Regarding: "Calculated Collections"  
Witness: Henthorne, JDH-1 EWMWY-NIP Summary-2017-03-31-As Filed

a. Please explain how line 24, "Calculated Collections," was derived on the Revenue Detail tab in JDH-1 EWMWY-NIP Summary-2017-03-31-As Filed.

b. If line 24 "Calculated Collections" differs from the actual collections generated from West Yellowstone's NIP rate, please provide the actual collection amounts.

PSC-006

Regarding: Total NIP funding from Great Falls  
Witness: Henthorne, Exhibit JDH-1 column D (1997)

Considering the representations made on pages 3 (lines 13-14) and 5 (lines 20-21) of your testimony, one can determine that the amounts shown on line 10 are bank fees and interest paid directly to the bank by EWM-Great Falls on behalf of EWM-West Yellowstone's NIP. Does this indicate that the total funding provided by EWM-Great Falls to EWM-West Yellowstone for the West Yellowstone NIP would include the \$9,570 shown on line 10 as well as the \$19,378.11 shown on line 14, for a total of \$28,948.93? Please explain.

PSC-007

Regarding: Fees and interest charges  
Witness: Henthorne, Exhibit JDH-1 column D (1997), lines 9 and 10

On page 3 of your testimony (lines 11-14) you represent that, for the period February 1, 1997, through November 30, 2006, both EWM-West Yellowstone and EWM-Great Falls paid bank fees and interest charges related to EWM-West Yellowstone's NIP.

- a. Are the fees and interest charges paid by EWM-Great Falls (referenced on page 3 of your testimony) included in the totals shown in line 10 of Exhibit JDH-1?
- b. Are the fees and interest charges paid by EWM-West Yellowstone (referenced on page 3 of your testimony) included in the totals shown in line 9 of this exhibit?
- c. Do the amounts shown in lines 9 and 10 include any form of cash outlay other than bank fees and interest charges?
- d. If the amounts referenced in (a) and (b) include payments or cash outlay for anything other than bank fees and interest charges, please provide a detailed list illustrating these items.

PSC-008

Regarding: Accounting for NIP loans  
Witness: Henthorne

Please confirm that for the time period February 1, 1997, through November 30, 2006, the West Yellowstone NIP was administered in such a way that the loans were carried on the books of the participating financial institution(s), while EWM-West Yellowstone and EWM-Great Falls simply paid fees and interest to the institution in order to administer the loans.

PSC-009

Regarding: West Yellowstone NIP fees and interest  
Witness: Henthorne

- a. Please list the bank(s) or financial institution(s) that fees and interest were paid to in each year for the time period February 1, 1997, through November 30, 2006.

b. For each bank or financial institution referenced in your response to (a), please provide a copy of the signed contract or agreement between EWM and the financial institution related to administration of the West Yellowstone NIP.

PSC-010

Regarding: Promotion of West Yellowstone NIP

Witness: Henthorne

a. Please explain efforts EWM made to promote the West Yellowstone NIP during the years of the Program's operation.

b. Please provide your thoughts about why participation in the West Yellowstone NIP ended.

PSC-011

Regarding: Termination of West Yellowstone NIP

Witness: Henthorne

a. Exhibit JDH-1 at p 2 includes a column that provides subtotal figures for 02/01/1997-11/30/2006. After 11/30/2006, it appears that the West Yellowstone NIP experienced no further activity. Please explain if EWM decided to terminate the NIP in November 2006.

b. If the West Yellowstone NIP was terminated in November 2006, please provide any EWM communications, notifications, or other documents that describe or authorize changes in the NIP, including any communications to the financial institution(s) that administered the NIP.

c. How has the West Yellowstone NIP been managed since 2006?

PSC-012

Regarding: NIP transfers to Great Falls

Witness: Henthorne, Exhibit JDH-1

a. Please explain why West Yellowstone continued to transfer money to Great Falls after all outstanding interest and fees for the West Yellowstone NIP had been paid.

PSC-013

Regarding: EWM 2006 USB stipulation

Witness: Henthorne

a. Does EWM believe that the West Yellowstone NIP was included in the stipulation terms in Docket D2005.12.177?

b. If the response to (a) is yes, please explain the effects of the 2006 stipulation on the West Yellowstone NIP.

## PSC-014

Regarding: Contribution to Energy Share  
Witness: Henthorne

In 2006, the Commission approved a stipulation between EWM, Montana Consumer Counsel, and Energy Share. Order 6719b, Dkt. D2005.12.177 (Oct. 12, 2006).

Was any portion of the NIP over-collection of \$450,000 that was contributed to Energy Share for low-income weatherization in Docket D2005.12.177 sourced from the West Yellowstone NIP? Please explain.

## PSC-015

Regarding: Differing EWM USB rates  
Witness: Henthorne

The 2006 Commission approved stipulation referenced in PSC-013 and PSC-014 establishes, *inter alia*, EWM's annual USB expenditure amount at 1.25% of EWM's annual normalized revenue.

Please explain the rationale for EWM's proposed USB rate of 1.12% for the West Yellowstone service area, including why the proposed West Yellowstone USB rate is lower than the 1.25% USB rate approved in the 2006 stipulation for EWM's other Montana service areas.

## PSC-016

Regarding: Funding between EWM service areas  
Witness: Henthorne

Please explain EWM's thoughts on whether it is acceptable for USB collections from EWM's Great Falls service area to be used for USB programs in West Yellowstone and, similarly, whether it is appropriate for USB collections from EWM's West Yellowstone service area may be used for USB programs in Great Falls.

## PSC-017

Regarding: One-time Energy Share contribution  
Witness: Henthorne, Exhibit JDH-1, line 4

a. In making the proposed one-time contribution of \$56,252 (i.e., 50% of the West Yellowstone NIP over-collection of \$112,506.66) to Energy Share, will EWM require Energy Share to expend the entirety of that contribution in EWM's West Yellowstone service area?

b. If the answer to (a) is no, please explain in detail how and where the contributed funds would be distributed.

c. Please identify the specific Energy Share programs that will be funded by EWM's proposed one-time contribution of \$56,252 to Energy Share of Montana, including the specific program objectives, program budgets, and program reporting requirements.

d. Please specify the time frame in which the one-time contribution of \$56,252 to Energy Share is anticipated to be expended.

PSC-018

Regarding: Proposed USB program

Witness: Henthorne at 7

a. In the proposed USB plan, in which 50% of the over-collected balance of \$112,506.66 is intended to be matched with collections of the continued rate of \$0.00644/CCF, will EWM require Energy Share to expend the entirety of that contribution in EWM's West Yellowstone service area? Please explain.

b. Please identify the specific Energy Share programs that will be funded by EWM's proposed USB plan, including the specific program objectives, program budgets, program evaluation, and program reporting requirements.

c. How does EWM plan to evaluate programs provided by Energy Share?

PSC-019

Regarding: Accounting of West Yellowstone USB programs

Witness: Henthorne

a. Please confirm that all USB activity and programs executed in the West Yellowstone service area will be the subject of a single and separate USB account in EWM's bookkeeping system.

b. If an unconditional confirmation cannot be made in (a), please explain in detail how West Yellowstone's USB programs and activities would be represented in EWM's bookkeeping system.

PSC-020

Regarding: Contract for proposed USB program

Witness: Henthorne

a. Does EWM have a completed contract with Energy Share for EWM's proposed USB plan in West Yellowstone? If so, please provide a copy.

b. If EWM does not have a completed contract as described in (a), please indicate if such a contract is contemplated, when EWM expects to execute it, and when it could be filed with the Commission.

PSC-021

Regarding: Documentation for proposed USB program

Witness: Henthorne

- a. Does EWM or Energy Share have a written plan or other documentation for EWM's proposed USB programs in West Yellowstone? Please provide a copy of the plan and any additional documentation.
- b. If EWM does not have a written plan or documentation as described in (a), please indicate if a written plan or other documentation is contemplated and when EWM can submit it to the Commission.

PSC-022

Regarding: Proposed USB Program Funding

Witness: Henthorne

- a. Please explain how long, in years, that EWM expects to apply the funding mechanism for the proposed USB plan for West Yellowstone.
- b. Please explain how EWM plans to continue or adjust the proposed USB plan (if approved by the Commission) after the over-collected balance has been fully expended.
- c. For the response given to (b), please describe the anticipated impacts that the anticipated plan adjustments would have on a typical residential customer.