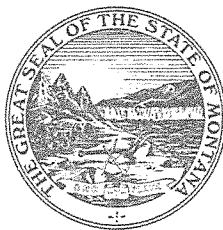


Montana Public Service Commission



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

March 29, 2018

Mr. Paul Schulz
Rate Analyst
Montana Consumer Counsel
P.O. Box 201703
111 North Last Chance Gulch, Suite 1B
Helena, MT 59620-1703

RE: Data requests in Docket D2017.12.89

Dear Mr. Schulz,

Enclosed please find data requests of the Montana Public Service Commission to Montana Consumer Counsel numbered PSC-023 through PSC-026 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 **April 12, 2018**. If you have any questions, please contact me at (406) 444-6182.

Sincerely,

Robin Arnold
Analyst, Regulatory Division
Montana Public Service Commission

Enclosure

cc: Service List

Service Date: March 29, 2018

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-023 THROUGH PSC-026 OF
THE MONTANA PUBLIC SERVICE COMMISSION
TO MONTANA CONSUMER COUNSEL**

PSC-023

Regarding: Great Falls-West Yellowstone USB Transfer
Witness: Schulz (page 5)

- a. Does the Montana Consumer Counsel ("MCC") support the proposal of EWM to transfer \$31,405 that was inadvertently placed in the EWM-Great Falls USB balance in December 2006 (see Henthorne testimony, page 4, lines 8-10, and top of page 17) to EWM-West Yellowstone? Please explain.
- b. If the response to (a) is yes, does MCC agree that \$31,405 is the correct amount that should be transferred from EWM-Great Falls to EWM-West Yellowstone?

PSC-024

Regarding: USB Percentage of Gross Revenues
Witness: Schulz (pages 6-7)

- a. Are you aware of any instance in which the Commission has waived for EWM the application of ARM 38.5.7020(2), which requires a USB charge be "established so as to generate, system-wide, an annual amount no less than 1.12 percent of the utility's ... annual revenues derived from natural gas services to end users"? If your answer is in the affirmative, please explain.
- b. Are you aware of any instance in which EWM has filed an alternative proposal for a USB charge to produce an annual revenue that would differ from the annual revenue raised from a USB charge of 1.12% of annual natural gas revenue?
- c. If your answer to (b) is affirmative, please provide details of such instance(s).

- d. If your answer to (b) is affirmative, please specify whether the identified instance(s) applied to customers within EWM's West Yellowstone service area or to EWM's entire natural gas service territory.

PSC-025

Regarding: Scope of USB Revenue Requirement

Witness: Schultz

- a. Do you believe the relevant USB statutes or administrative rules allow a utility to establish different USB charges for particular service areas within its entire service territory? Please explain.
- b. Do you think that Mont. Admin. R. 38.5.7020(2), which requires a USB charge that generates no less than 1.12% of annual revenues, is required in the aggregate for the entire service territory of a utility?
- c. If your response to (b) is affirmative, how would an aggregate 1.12% be managed and accounted for where, as here, the utility has discrete service territories?
- d. Conversely, do you think that Mont. Admin. R. 38.5.7020(2), which requires a USB charge that generates no less than 1.12% of annual revenues, is required for discrete service territories of a utility? If so, how would 1.12% among various discrete service territories be managed and accounted for where, as here, the utility has discrete service territories?

PSC-026

Regarding: Segregation of USB Service Areas

Witness: Schultz (pages 8, 9, and 11)

- a. Based on your stated opposition to cross-subsidization of USB revenues between EWM's service areas, e.g., Great Falls and West Yellowstone, please describe how you think EWM should structure its administrative, contractual, and accounting frameworks to ensure that no cross-subsidization occurs between service areas.
- b. Because EWM has proposed to obtain USB program services for West Yellowstone from Energy Share, which also provides USB program services for EWM's Great Falls service area, please explain what administrative, contractual, and accounting requirements should be established between EWM and Energy Share to ensure that no cross-subsidization occurs between EWM's USB service areas.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Data Request PSC-023 through PSC-026 of the Montana Public Service Commission to Montana Consumer Counsel issued on March 29, 2018, in D2017.12.89 was served upon the following, by mailing a true and correct copy, via first class mail, on the 29th day of March, 2018, addressed as follows:

Robert Nelson
Jason Brown
Montana Consumer Counsel
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P.O. Box 201703
Helena, MT 59620-1703

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/s/ Sydney Kessel
Sydney Kessel, Administrative Assistant

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