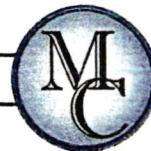




MISSOULA

CITY OF MISSOULA

MISSOULA COUNTY



BCC 2019-077

May 2, 2019

Mr. Robert Rowe, President and CEO
NorthWestern Energy
11 E. Park St.
Butte, MT 59701

Dear Mr. Rowe:

Thank you for the opportunity to comment on NorthWestern Energy's Draft 2019 Electricity Supply Resource Procurement Plan.

In April 2019, the Missoula City Council and the Missoula Board of County Commissioners, with the support of hundreds of local residents, businesses and community organizations, adopted a goal of 100% clean electricity by 2030 for the Missoula urban area. There is truly broad public support for this initiative. And that support is not limited to Missoula. Nonpartisan polling has found that 90% of Montanans support increased use of solar energy, and 86% support increased use of wind energy to meet our state's future needs. Across the country, more than 130 local governments have committed to 100% clean energy, and many are working directly with their local utilities to achieve this transition. Investor-owned utilities that have committed to achieve 100% carbon-free electricity include Idaho Power, Rocky Mountain Power, Xcel Energy, Green Mountain Power, the Public Service Company of New Mexico and Avista, as well as a number of municipal utilities and electric cooperatives.

Approximately 95% of the electricity consumed in the Missoula urban area is purchased from NorthWestern Energy; both City and County governments are NorthWestern Energy customers, as are the majority of the 117,000 residents we represent. We are acutely interested in NorthWestern's Electricity Supply Resource Procurement Plan. NorthWestern's approach to resource procurement has great potential to help or hinder our efforts, as well as to benefit, or detract from, the economic and environmental health of our community.

The Draft Resource Procurement Plan emphasizes that NorthWestern intends to pursue "lowest cost" resources. We ask that you consider the full, long-term costs of energy resource choices as you make decisions that have such profound effects on our future. Please consider the long-term costs of climate change and do a complete accounting. A Yale University article from April 2019 estimates that if we do nothing, *annual* costs associated with climate change will exceed \$220 billion. Over the long-term, a transition to more renewables will save money. As you know, the price of solar and wind technology has declined precipitously in recent years, and the costs of energy storage technologies, especially batteries, are declining even faster. Renewable resources also have the advantage of zero fuel cost, reducing the risk of price volatility for consumers. They do not require the construction of costly fuel infrastructure such as gas pipelines. They do not emit hazardous air pollutants or greenhouse gases, and, unlike thermal

power plants, solar and wind farms will never leave their owners on the hook for massive cleanup costs.

As we look ahead to 100% clean electricity, we are starting in a strong position. 61% of NorthWestern Energy's current generation portfolio is carbon-free, and we greatly value these existing hydroelectric, wind and solar resources. But we believe that we can, and must, go further. We understand that reaching 100% clean electricity – or even 90% – will not be easy. How will NorthWestern Energy work with us and learn from other local governments and utilities that are finding innovative ways to make this transition? We believe that a commitment to renewable electricity has the potential to benefit both Missoula and NorthWestern Energy. This transition can facilitate the creation of a profitable, forward-looking business model that will sustain your company and our community well into the future. How will Northwestern Energy start planning for and investing in that future now? We look forward to learning how the revised Resource Procurement Plan will catalyze our broadly supported transition to clean electricity by 2030.

Sincerely,

City of Missoula

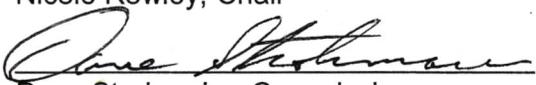
John Engen, Mayor

Bryan von Lossberg, Council President

Missoula Board of County Commissioners



Nicole Rowley, Chair



Dave Strohmaier, Commissioner



Josh Slotnick, Commissioner

BCC/ac