

How to Comment to the Public Service Commission

1. You must submit your comment by January 3, 2020 or attend the public hearings on December 9 in Helena. To comment, you have two choices. You can write an on-line comment at the Montana Public Service Commission's website, or you can write and mail a letter (sample letter here).

- I wish it were easier to comment on-line but this is obviously a public service commission that hasn't any idea what "public service" actually means. Go to <http://psc.mt.gov/>, then click on DOCUMENTS & PROCEEDINGS, then from the pull-down menu choose, COMMENT ON A PROCEEDING. CLICK ON "Continue As Guest" and then "Comment on a Proceeding" again from the pull-down menu. Fill out the form with your personal information. When you get to *Item*, click on REGULATORY DOCUMENT and type in *Tracking #* 2019.08.052 and "2019 Electricity Supply Resource Procurement Plan" will pop up in the *Tracking Name*. You can write your comment in the *Comment/Message* box or upload your letter by clicking on the *Browse* button.
- Use your own words to tell commissioners why you think they should reject NorthWestern Energy's plan. Print and send your letter to:

Montana Public Service Commission
P.O. Box 202601
Helena, MT 59620-2601

2. Begin your comment with this sentence: I wish to submit comments regarding Docket 2019.08.052 for the NorthWestern Energy 2019 Electricity Supply Resource Procurement Plan.

3. Tell the commissioners who you are: your name, where you live, describe your family, how long you've lived where you live, and that you have been a NorthWestern Energy ratepayer for __ years. Tell them you are concerned about continually rising rates. Tell them you are concerned about climate change and the costs of greenhouse gas pollution.

4. Tell them that you don't think NorthWestern Energy does a very good job of planning if its recent request for two rate hikes – one approved for \$6.5 million and the other pending for \$23.8 million – are any indication. Tell them the Public Service Commission must do its job of overseeing and regulating Montana's monopoly utility. This company should not go forward with any new acquisitions based on the false assumptions it makes in its plan. These false assumptions include but are not limited to:

- **Colstrip is closing sooner than 2042.** At a September 2019 meeting of the Montana Board of Regents at Montana Tech in Butte, NorthWestern Energy's vice-president for transmission, Michael Cashell, said he thought the Colstrip plants would shut down completely "in less than a decade." Yet the company's final procurement plan says that the plant will remain open until 2042. Why the

discrepancy? Why did the company publish a plan that its vice-president knows is a sham? Cashell's statement is consistent with the time horizon envisioned by Colstrip's other owners. This throws into doubt the company's entire procurement plan. You must not let this company acquire any new assets based on assumptions even its executives don't believe. Make the company model what its vice-president for transmission says is going to happen. Make the company plan for Colstrip closing within 10 years.

- **NorthWestern Energy's modeling is suspect, incomplete, and often wrong.** The plan doesn't adequately model renewable technologies like solar and wind generators paired with batteries or the Gordon Butte pump storage facility. It models solar by itself, wind by itself, and storage by itself. What sense does that make? When a utility does take the time to model these integrated technologies, it reaches the conclusion that renewables and storage are cheaper than gas generators. In Colorado, renewables paired with storage was *the least expensive* option for moving into the future, cheaper than existing coal, cheaper than a fleet of natural gas "peaker" plants. You probably can't get more unreliable than what happened with Colstrip this summer, and NorthWestern Energy's \$23.8 million rate increase. You must not let this company get away with saying renewables aren't stable and reliable. Don't allow the company spend a billion dollars of ratepayers' money for new acquisitions without a competent cost comparison between existing coal, a build-out of natural gas, and a move to renewable energy backed by storage technologies.
- **NorthWestern Energy fails to include the cost of gas pipelines in its cost assumption for building and operating gas-fired power plants.** NorthWestern has previously stated new gas pipelines would be necessary to operate any significant new gas power plants on its system, however these costs were not included in the plan. Why is the company hiding these costs? Again, the company is talking out of both sides of its mouth. It says it will need pipelines, but it doesn't model the costs. You must not allow this company to acquire ratepayer-paid gas generators without the costs of the pipelines validated and included in the plan.

5. Add a summary statement at the end. Tell the commissioners to do their job, which is to provide Montanans with affordable and reliable energy at a just rate. Sign, add your address, and send.