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

IN THE MATTER OF NorthWestern Energy's) Regulatory Division
2015 Electricity Supply Resource Procurement Plan) Docket No. N2015.11.91

NorthWestern Energy's Motion for Extension

Pursuant to ARM 38.2.312, NorthWestern Corporation d/b/a NorthWestern Energy ("NorthWestern") respectfully requests that the Montana Public Service Commission ("Commission") grant this *Motion for Extension* ("Motion") in the above-captioned Docket. In support thereof, NorthWestern provides the following:

Pursuant to ARM 38.5.8226, NorthWestern must file "a comprehensive, long-term portfolio management and electricity supply resource procurement plan by December 15 in each odd-numbered year." Accordingly, NorthWestern is required to file its 2015 Electricity Supply Resource Procurement Plan ("2015 Plan") by December 15, 2015.

In November of 2014, after receiving all necessary regulatory approvals, NorthWestern finalized its acquisition of the hydroelectric facilities from PPL Montana. The successful acquisition and integration of the hydroelectric facilities redefined NorthWestern's retail electricity supply portfolio, and set in motion a new resource planning regime based on an expanded portfolio of load-serving capacity resources and a shift to operations-based supply. In early 2015, NorthWestern established an initiative, including the hiring of operational and modeling consultants, to explore, define, evaluate, and plan for the implementation of measures to improve the overall performance of its supply resources as a unified fleet. Termed optimization, this initiative envisioned a set of conditions and capabilities to more efficiently provide for a combination of load-serving capacity and energy, and economically supply ancillary services including contingency reserves, load following, and regulation.

During 2015, NorthWestern and its consultants, Ascend Analytics and HDR, Inc., began the supply portfolio optimization with a detailed examination of the hydroelectric facilities. The initial findings of the optimization study indicate that the scope of the changes are significant enough that it has altered NorthWestern's resource planning framework creating long-term implications for the configuration and operation of the supply portfolio.

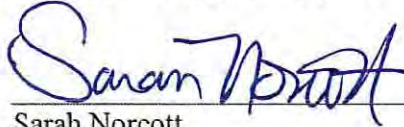
Given these changes and implications, NorthWestern's work necessary to complete an electricity supply resource procurement plan is substantially more complex and time consuming than in prior years. In addition, this work was not able to commence until early 2015 after the hydroelectric facilities were approved as electric supply resources and acquired by NorthWestern. As a result, NorthWestern notified its Electric Technical Advisory Committee ("ETAC") on August 26, 2015, that it had experienced delays in delivery of work products integral to the planning process from outside consultants. These work products were needed in

order to complete the analytical framework of the 2015 Plan and used as the baseline modeling inputs for existing hydroelectric and thermal resources. It has taken until the fourth quarter of 2015 to complete this work and move forward with the 2015 Plan analytics. Given these reasons and to allow sufficient time for completion, review, and submission of the 2015 Plan, NorthWestern is requesting an extension until March 31, 2016 to file its 2015 Plan.

Wherefore, based on the foregoing, NorthWestern respectfully requests that the Commission grant an extension for NorthWestern to file its 2015 Plan by March 31, 2016.

RESPECTFULLY SUBMITTED this 25th day of November 2015.

NORTHWESTERN ENERGY

By: 
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CERTIFICATE OF SERVICE

I hereby certify that a copy of Northwestern Energy's Motion for Extension in Docket No. N2015.11.91 has been hand delivered to the Montana Public Service Commission and to the Montana Consumer Counsel this date. It has been e-filed on the PSC website, emailed to counsel of record, and served on the most recent service list by mailing a copy thereof by first class mail, postage prepaid.

Date: November 25, 2015



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