



At Northern Plains, we're Montanans of all types and stripes. We're farmers and ranchers, teachers and parents, hard workers and businesses owners. We enjoy Montana's great outdoors, love our neighbors, and want our communities to thrive. We care passionately about generations to come and want to ensure we've provided a good future for them. We want our communities to transition to clean energy sources such as energy efficiency, solar, and wind, and we want to do it now to protect the places and people we love.

We are working towards a clean energy future, and to get there we'll need the help of Montana's power companies. Unfortunately, our largest power company - NorthWestern Energy - has released their 20-year Integrated Resource Plan and it's clear they are planning for a fossil-fueled future.

At Northern Plains, we believe in the power of everyday Montanans to come together, stand up to corporations, and have a say in the decisions that impact our lives. That's what we're doing on December 9th at the Montana Public Service Commission (PSC). We're heading to the PSC to tell them to reject NorthWestern Energy's plans for a status quo, fossil-fueled future. Join the Ratepayer Rebellion by speaking out on December 9th.

Here are some talking points to get you started:

- 1. NorthWestern Energy's Integrated Resource Procurement Plan should include current operating and management costs associated with existing generating facilities and power plants.**

The plan does not provide an explanation for the current costs associated with operating and managing generation facilities in the utility's current resource portfolio. Without this analysis, rate-payers cannot verify the cost effectiveness of *current* generation against *future* options. Furthermore, rate-payers cannot be certain that the utility has met its least cost obligation if current generating facilities were not evaluated for cost-effectiveness.

- 2. NorthWestern Energy's Integrated Resource Procurement Plan should include a model in which wind, solar, and energy storage are considered in combination.**

The plan only modeled for wind and solar individually for cost effectiveness in meeting the company's energy needs. We believe a comprehensive plan must model a combination of wind, solar, and storage technology as well as energy efficiency and demand response.

- 3. NorthWestern Energy's should consider the social costs associated with carbon emissions when evaluating cost effectiveness of current and future generation.**



In a landscape where regional utilities are supporting bold action on carbon reduction, NorthWestern Energy's final plan should include an analysis of the social costs of carbon associated with future generation assets. Without an analysis of how emissions would contribute to flooding, droughts, and other impacts, rate-payers cannot be sure that the utility has acquired the lowest-cost generation resource.

4. NorthWestern Energy's Integrated Resource Procurement Plan should model all existing resources identified in NorthWestern Energy's Request for Interest that could be acquired in order to bring fairness to their acquisition process.

Northern Plains believes that rate payers cannot in good faith assume that they are receiving the most cost effective power when, as NorthWestern states on page 11-3 of the plan, "The RFP process may result in the acquisition of resources identified in the modeling conducted for this plan; however, it is more likely that resources that were not identified or modeled, or could not identified during the planning process, will be acquired." If the responses to the RFI did in fact provide validation of the new build resource options included in Chapter 7 of the draft plan, the final plan should model these options.

5. NorthWestern Energy's Integrated Resource Procurement Plan should model a scenario in which Colstrip Power Plant closes within in the next 20 years.

The plan does not model for an earlier closure of the Colstrip Unit 4 power plant, despite the fact that every other owner of the power plant (Puget Sound Energy, Avista Corp, PacifiCorp, Portland General Electric) planned for an earlier closure.

Here's how you can take action:

- Deliver comments in person on Dec 9 at the Ratepayer Rebellion at the PSC!
- Attend one of the PSC's regional "listening sessions" on NorthWestern's 20-year plan in Missoula (Dec 17), Billings (Jan 2), or Lewistown (Jan 3) each at the local library, times TBA by the Public Service Commission.
- Send in your comments online by visiting:
northernplains.org/nwe-20-year-plan-comments .
- Mail comments to the PSC referencing **docket number 2019.08.052**

Montana Public Service Commission
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Thank you for working side-by-side toward a clean energy future! Questions? Contact Makenna at 406-248-1154 or makenna@northernplains.org.